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# Code of **Ethics**

**Scolmore**<sup>®</sup>  
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# Introduction

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*Since our incorporation in 1989 we have become a significant force in the electrical accessory market. We're proud to be a British, family-run business, with an excellent track record of listening to what our customers need and providing the right solution every time.*

*Scolmore International is a group that revolves around people – our team, our customers and the strong relationships we build and maintain through our consistent high levels of service and delivery. I strongly believe that the dedication and skills of our team have contributed to the continued success of Scolmore.*

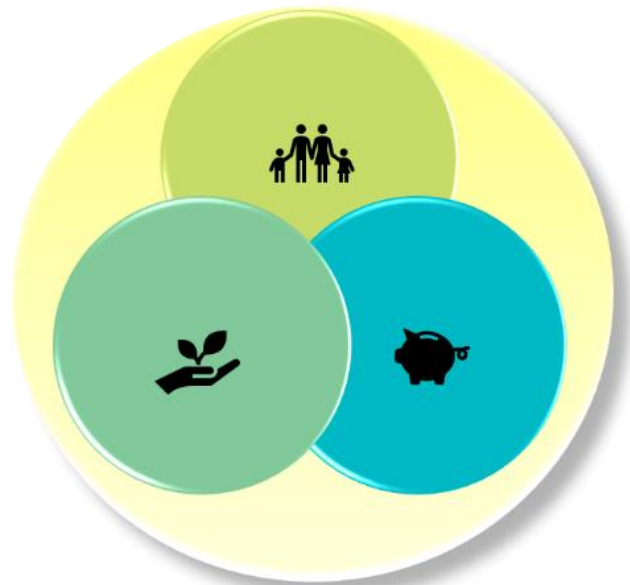
***The Company is very much built on people.***

*Each individual makes a unique contribution to the business and its customers. The professionalism, skills and knowledge of our team throughout the business allow us to deliver every customer the product they need, when they need it, high quality at its best price.*

***Our long-term business success and continuous growth is only possible by operating responsibly in alignment with universal standards and supporting the society.***

*This is why we pursue our growth in a sustainable way by taking care of the well-being of our human capital, the communities in which we operate as well as the planet, in a compliant and responsible way.*

*I am delighted to announce today the launch of the Scolmore Code of Ethics which crystallises the universal standards informing the way we conduct our business.*



Kevin Beech, on behalf of the Scolmore Group Board of Directors

The Scolmore Code of Ethics is endorsed by the whole Board of Directors and becomes effective from the 1<sup>st</sup> June 2023. After publication, staff will be offered appropriate training on relevant topics and expected to confirm their understanding and adherence to this Code.



# Contents

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Introduction .....	1	<i>The business role</i> .....	8
Contents .....	2	<i>Transparency in supply chains</i> .....	8
Scolmore's Values .....	3	<i>Zero tolerance to modern slavery</i> .....	8
About the Code of Ethics .....	4	Health & Safety .....	9
<i>Why a Code of Ethics?</i> .....	4	<i>Prevention</i> .....	9
<i>To Whom does this Code apply?</i> .....	4	<i>H&amp;S commitment</i> .....	9
<i>Individual accountability</i> .....	4	<i>Your contribution</i> .....	9
<i>What if there is a conflict with other applicable regulations?</i> .....	4	Environment .....	10
<i>How is the Code of Ethics enforced?</i> .....	4	Fair competition .....	11
<i>Amendments to this Code</i> .....	4	<i>Why preserving competition?</i> .....	11
How to report a concern .....	5	<i>Consequences</i> .....	11
<i>What to report?</i> .....	5	<i>Anti-competitive practices</i> .....	12
<i>If you are an employee</i> .....	5	<i>Scolmore's commitment to fair competition</i> .....	12
<i>If you are a business partner</i> .....	5	Legal compliance .....	13
<i>Confidentiality &amp; non-retaliation</i> .....	5	<i>Export control</i> .....	13
Our Human Capital .....	6	<i>Responsible material sourcing</i> .....	13
<i>Equality and diversity: what is it all about?</i> .....	6	<i>Financial integrity</i> .....	13
<i>Glossary and practical examples</i> .....	6	<i>Anti-money laundering</i> .....	13
<i>Our commitment</i> .....	6	Business integrity .....	14
<i>Training opportunities and talent retention</i> .....	6	<i>Preventing corruption</i> .....	14
Human Rights .....	7	<i>Our full commitment</i> .....	14
<i>The role of private enterprises</i> .....	7	<i>Definitions</i> .....	14
<i>Recruitment and selection</i> .....	7	<i>Gifts and hospitality</i> .....	15
<i>Sustainable practices</i> .....	7	<i>Political donations</i> .....	15
<i>Education and training</i> .....	7	<i>Charitable donations</i> .....	15
Modern slavery .....	8	<i>Conflict of interests</i> .....	16
<i>Why?</i> .....	8	Protecting our assets .....	17
<i>The law</i> .....	8	<i>Intellectual property</i> .....	17
<i>The figures</i> .....	8	<i>Data protection</i> .....	17
		<i>Cyber-security</i> .....	17
		<i>Social media</i> .....	17

# Scolmore's Values

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We are **united** in bringing together our values, ideals and goals to create a positive environment for our workforce.



We **nurture** our people and the relationships we have with our customers in order to develop mutually beneficial and respectful partnerships.



We believe in **innovation** and actively encourage our employees to think creatively.



We operate in a dynamic, ever-changing market. **Quality** is essential across every area of our business, including service levels and products.



We believe in our **People**. We invest in training and personal development across all areas of our business. We provide opportunities for progression.



We aspire to be **excellent** in all disciplines by listening to our stakeholders and formulating sustainable plans.



# About the Code of Ethics

## Why a Code of Ethics?

Welcome to the Scolmore Group Code of Ethics (insofar CoE).

At Scolmore integrity is essential to our business.

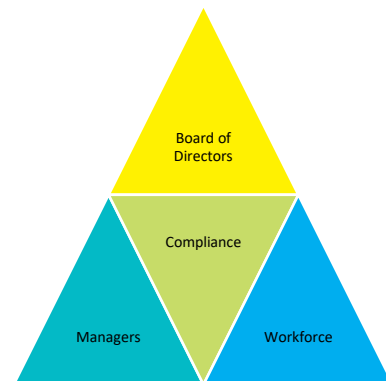
This CoE reflects the core values and the high ethical standards which inspire our employees, business partners and all other stakeholders.

## To Whom does this Code apply?

This CoE applies to our workforce, which includes for the purpose of this Code all individuals who work for us and for any of our operative companies, anywhere in the world: full-time or part-time employees, temporary workers, contract workers, officers as well as the members of the Group Board of Directors.

We also expect our business partners (i.e. customers as well as stock and service suppliers, distributors, and joint venture partners) to act with integrity and in compliance with the principles highlighted in our CoE.

- Discuss and promote adherence to the principles and rules set out in this CoE with their teams and business partners,
- Actively listen to the concerns of their team members, providing support and encouraging any violations of the Code to be reported,
- Request the Legal and Compliance department's advice when in doubt and escalate any concerns,
- Lead by example.



## What if there is a conflict with other applicable regulations?

Scolmore operates in many different countries with their own legal and regulatory requirements. Should there be a conflict between the principles set out in this CoE and the local applicable regulations, the most stringent rules will prevail.

## How is the Code of Ethics enforced?

We expect our workforce to comply with this CoE and its related policies and procedures. A confirmed violation of this CoE may result in disciplinary actions, up to and including termination of employment or business relationship as well as potential legal actions against the offenders.

## Amendments to this Code

This CoE will be updated from time to time. All amendments shall be approved by the Board of Directors and will be published on the Scolmore website.



## Individual accountability

We expect all our workforce to be familiar with and adhere to this CoE and its related policies and procedures.

Managers have additional responsibilities in ensuring compliance. They must:

- Ensure effective implementation of this CoE in the daily operations,
- Set a tone of integrity in the objectives and operations of their teams, ensuring that their teams understand the Code,

# How to report a concern

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We are committed to conducting our business with honesty and integrity and we expect all employees to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly operating illegally or unethically.

A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

If you think there may be a violation of this Code of Ethics or its related policies or procedures, it is your responsibility to **speak up!**

At Scolmore we will always welcome genuine reports, investigate reported suspected or known misconducts, and take appropriate action based on our findings.



## What to report?

Criminal offences committed or likely to be committed, violations or failures to comply with any legal obligations, including but not limited to Health and Safety, Human Rights, Environment, Fraud, Corruption; Influence peddling; Data protection; Harassment; International sanctions and embargoes; Discrimination

## If you are an employee

In most instances the preferred route to report your concerns is your line manager. However we understand that in certain circumstances this might not be the most comfortable way to share your concerns.

If this is the case, you can either speak to HR or the Legal and Compliance department.

Scolmore Group and its subsidiaries will always protect you from any kind of retaliation if you report actual or potential violations in good faith. All reports made in good faith remain confidential regardless of how they are notified.

Additional information relevant to the workforce can be found in the *Whistleblowing Policy*.

## If you are a business partner

External whistleblowers can report any concerns by emailing directly [compliance@scolmore.com](mailto:compliance@scolmore.com)

## Confidentiality & non-retaliation

Reports will be investigated as appropriate in a manner that maximises confidentiality.

At Scolmore we do not allow any retaliation against any person who makes a report in good faith, or who cooperates in an investigation.



# Our Human Capital



## Equality and diversity: what is it all about?

Equality is about ensuring that everybody has an equal opportunity, and is not treated differently or discriminated against because of their characteristics. Diversity is about taking account of the differences between people and groups of people, and placing a positive value on those differences.

Good equality and diversity practices make sure that the services provided to people are fair and accessible to everyone. They ensure that people are treated as equals, get the dignity and respect they deserve and that their differences are celebrated.

## Glossary and practical examples

- **Direct Discrimination:** when someone is treated differently and worse than someone else on the grounds of race, gender, sexual orientation, disability, religion or beliefs, age.
- **Indirect Discrimination:** when a practice, policy or rule which applies to everyone in the same way, has a detrimental impact on a larger proportion of people than other on the ground of race, gender, sexual orientation, disability, religion or beliefs, age.
- **Harassment:** when a person is subjected to unwanted conduct that has the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.
- **Victimisation:** when individuals are treated less favourably because they have brought or intend to bring proceedings related to "protected characteristics", or they have supported a complaint to do with a 'protected characteristic', or they are thought to have done so.

## Our commitment

Scolmore actively seeks to create and maintain a working environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, gender, sexual orientation, age, disability, religion or beliefs.

We firmly oppose all forms of discrimination, remove unfair and discriminatory practices within the business and encourage full contribution from our diverse community. We are committed to actively opposing all forms of discrimination.

We believe that by providing a stimulating and supporting working environment we enable our staff to fulfil their personal potential and creativity.

Such an environment cannot exist where any member of staff is not treated with dignity and respect, free from harassment, bullying, victimisation, intimidation, aggression or coercion.

We also aim to provide a service that does not discriminate against clients and customers.



## Training opportunities and talent retention

A great part of Scolmore's success is built on people. Each individual makes a unique contribution to the business and its customers. The professionalism, skills and knowledge of our team throughout the business allow us to deliver a high service level to our customers and business partners.

We invest in our human capital by attracting, engaging, identifying, developing and retaining those individuals who bring value to our organisation.

Talent management and training opportunities are our priorities.

# Human Rights

The responsibility to respect human rights is a global standard of expected conduct for all business enterprises wherever they operate. It exists independently of States' abilities and/or willingness to fulfil their own human rights obligations, and does not diminish those obligations.

This responsibility exists over and above compliance with national laws and regulations protecting human rights.

**Internationally recognised human rights** are those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

## The role of private enterprises

Businesses play an important role in **promoting** human rights. They have the power to drive equality in both the workplace and in the community, and through offering employment opportunities they can support the advancement of social and economic rights.

Furthermore, globalisation means that businesses activity can affect individuals and communities within the countries they operate in and across borders. Their activity affects not just customers, employees, and contractors along the supply chains, but often entire communities as well as the environment. This makes

it vital that every business proactively **protects** against abuses and ensure human rights are considered at every stage of business activity.

As a responsible business, we seek governmental and international guidance about how to avoid contributing to human rights harm in these difficult contexts.



## Recruitment and selection

Our working practices are fair and compliant with all applicable and current legislation as well as reflecting best business practices. We aim at filling our vacancies in a timely and efficient manner by recruiting our staff on the basis of their skills, qualifications, experience, potential and motivation, regardless of gender, race, ethnic origin, sexuality, religion, marital status, age or disability.

Temporary staff are recruited on the same basis as permanent staff and we only engage with specified and reputable employment agencies to source labour.

## Sustainable practices

We are firmly committed to acting in a socially responsible manner and in line with sustainable practices. This include ensuring that **all** in our supply chain adhere to our high ethical standards by looking after the health and safety of their workforce, prohibiting child labour and forced labour, and complying with conflict minerals and environmental protection regulations.



Non-compliance with our values might determine the termination of our contractual relationship and/or commercial sanctions.

## Education and training

Human rights education constitutes an essential contribution to the long-term prevention of human rights abuses and represents an important investment in the attempt to achieve a just society in which all human rights of all persons are valued and respected.

Through internal training and awareness campaigns, we endeavour to promotes values, beliefs and attitudes that encourage all individuals to uphold their own rights and those of others as well as an understanding of everyone's common responsibility and contribution to make human rights a reality in each community.



# Modern slavery

## Why?

Modern slavery is happening in the UK and around the globe today. It is a serious and often hidden crime resulting in an abhorrent abuse of human rights, in which people are exploited for criminal gain.

## The law

The UK Modern Slavery Act is one of the most far-reaching pieces of legislation in the world addressing issues of modern slavery.

Modern slavery is defined as “a term used to encapsulate both offences in the Modern slavery Act:

- slavery, servitude and forced compulsory labour;
- and human trafficking”

The impact can be devastating for the victims.

## The figures

In 2016 there were an estimated **40 million** people in slavery globally.

## The business role

Businesses have a pivotal role to play in the fight against modern slavery.

From a business point of view, any association with modern slavery has the potential to damage reputation in a serious and potentially permanent way. It creates the image of an organisation that cannot be trusted and puts profits before the welfare of its workers and other stakeholders. Companies may face backlash from consumers if they are found to be in any way complicit in modern slavery.

## Transparency in supply chains

The supply chains of large organisation are often complex with many tiers. Even so businesses can take a number of steps in order to mitigate the risk of their products or services being made by slaves or forced labour.

## Zero tolerance to modern slavery

Scolmore's policy is Zero tolerance to modern slavery.

- ⇒ We engage only with reputable working agencies
- ⇒ We are strongly committed to conducting our business in a lawful and ethical manner
- ⇒ We engage only with business partners committed to the same principles.
- ⇒ We regularly assess our supply chain directly as well as through independent auditors.



# Health & Safety

## Prevention

Scolmore promotes and encourages a culture of accident prevention, health protection and risk awareness at work. We require our workforce to strictly apply safety rules and remain vigilant at all times to identify potential risks and address them immediately. We strive to provide our workforce with additional training designed to promote and support individual safety and wellbeing.

## H&S commitment

It is Scolmore's commitment to uphold all that is reasonably practicable, to establish healthy and safe working conditions for all employees, contractors and visitors using or accessing Scolmore facilities worldwide.

We conform to the standards required by the UK Health and Safety at Work Act 1974 as well as any

other statutory requirements which relate to the business' activities.

As far as reasonably practical we provide and maintain a safe and healthy environment and plants as well as safe systems of work at all times.

Our workforce receives information, training, instructions and guidance in order to address H&S concerns and prevent H&S risks..

We continually monitor the effectiveness of our Health and Safety Policy and revise it as necessary

## Your contribution

Protecting H&S is a daily battle and we should never drop our guard. We must all stay vigilant at all times in order to identify risks, manage them and raise awareness in order to prevent disease and accidents.

Health & Safety	
☑ DOs	☒ DON'Ts
⇒ Conform to the H&S policy and safe systems of work	⇒ Engage in activities that might violate applicable H&S rules
⇒ Take responsibility for your own safety and the safety of your co-workers	⇒ Work under the influence of alcohol and/or drugs and/or medications which might affect your work performance
⇒ Comply with the Manual Handling Operations Regulations 1992 when lifting loads below 25 KG	⇒ Manually handle loads above 25Kg and when below 25KG
⇒ Carry out safety inspections of the working environment under your control in order to maintain high standards	⇒ Smoke in any enclosed area pertaining to Scolmore Group premises
⇒ Make your work area as well as the access to it as safe as possible	⇒ Leave your working area untidy
⇒ Ensure that all sub-contractors adhere to the H&S policy at all times	⇒ Access certain areas of the business without the required PPE
⇒ Report any accident and/or near misses	⇒ Create risks to your mental and physical well-being or that of your colleagues
⇒ Use PPE as and when required	⇒ Retaliate against anyone raising concerns related to H&S.
⇒ Assess your workstation when using a display screen equipment	
⇒ Adhere to the First aid as well as Fire prevention and emergency procedures	
⇒ Visually inspect before use all machinery you are going to use to perform your tasks and report any concerns	

# Environment



Scolmore operates with respect and care for the environment and expects the same from our supply chain.

We aim at preventing pollution and reduce our carbon footprint in order to contribute towards a decarbonised economy, without compromising the H&S of our staff, contractors, customers or the public.

We comply with our legal and regulatory obligations as well as with any other requirement we deem relevant to our business and continually review our environmental performance in order to implement solutions aimed at reducing the significant environmental impacts of our operations and activities.

We educate our staff to consider our products and business processes from a life-cycle perspective. We encourage them to identify problems in order to make suggestions aimed at improving any environmental aspects, without compromising on a high-quality product and a customer service level that exceeds all customer expectations.

We set targets in order to fulfil our long-term environmental ambition.



# Fair competition

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## Why preserving competition?

Competition is good for consumers and businesses. It means that people get better products at lower prices, and it helps ensure the most consumer-focused and innovative businesses are the ones that succeed.

Competition is an essential market driver. Successful companies compete vigorously but fairly and seek to obtain competitive advantage only through fair and lawful means.

## Consequences

The violation of competition laws (also known as anti-trust) can lead to severe personal as well as business consequences such as:

1. Business fines (up to 10% of the group turnover), personal fines, imprisonment,
2. Disqualification (up to 15 year) from acting as a company director,
3. Civil lawsuits for damages,
4. Reputational damage,
5. Years spent fighting legal cases,
6. Disruption to the usual business during cartel investigations.





## Anti-competitive practices

There are two types of anti-competitive activities:

### 1. Agreeing not to compete with another business ("cartels")

- **Price fixing** - Agreements to fix purchase or selling prices, or any other trading conditions (i.e. discounts or rebates, etc.) maintain or raise prices;
- **Agreements on production / output capacity** - Agreements to limit or control production or output capacity as they inevitably result in maintaining or raising prices (i.e. setting quotas or levels of output, etc.);
- **Market sharing schemes** - Agreements to share customers, or markets, or sources of supply
- **Bid rigging** - Agreements between competing bidders to submit pre-arranged bids to answer a call for tender

- Agreements to place other trading parties at disadvantage by applying dissimilar conditions to similar transactions

An agreement does not have to be in writing for it to be illegal. You can break the law if you have an informal conversation (or '*gentleman's agreement*') with another business, even if the agreement is not carried out.

### 2. Abusing a dominant position

Having a dominant position is not illegal in itself. What both UK and EU competition laws prohibit is the abuse of a dominant position in ways that **deter or make it unviable for other businesses to join, remain or compete in a normal way in the market.**

## Scolmore's commitment to fair competition

Scolmore does not engage in anti-competitive activities. All relevant staff are required to undergo appropriate training on this topic.

✔ DOs	✘ DON'Ts
⇒ Comply with all applicable competition laws and regulations	⇒ Discuss with a competitor prices, margins, rebates, costs, stock levels, allocation of customers, suppliers, territories, associates of contracts
⇒ Report verbally any suspicion of possible anti-competitive behaviour to the Legal & Compliance department	⇒ Share sensitive information with competitors, either directly or indirectly (i.e. via trade associations)
⇒ Avoid formal or informal business contacts with competitors	⇒ Denigrate or discredit competitors in any manner
⇒ Avoid disclosing any inappropriate and sensitive information to third parties	⇒ Implement any acquisition or merger without seeking legal advice
⇒ Pay attention to your written communication and avoid using misleading words or making jokes	
⇒ Always compete fairly	

# Legal compliance

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## Export control

In today's global economy, ensuring compliance with trade and export controls is a critical part of doing business.

Trading goods from country to country is nowadays quite a usual practice for many businesses. However there are certain rules in place which need to be taken into account when moving goods, dealing with certain individuals/enterprises and transacting money across country borders.

Export controls are legislative frameworks which allow Governments to control the export of certain goods in order to promote global security and facilitate responsible exports.

They consist of laws and regulations applied globally, regionally and nationally.

Export controls often exist for the protection of trade, but they can also have a strong security dimension. For example technology, chemicals or military goods that could pose a threat to national or international security are an example of the latter.

They are also used to leverage the promotion of human rights and the promotion of democracy.

Export control compliance entails making sure we have control over our export from start to finish. It also means that we have checked it against the local and international laws and regulations that guide global, regional or country-specific trade.

The penalties for violating these regulations can be hefty and involve criminal prosecution.

Scolmore requires the entire workforce to conduct due diligence to ensure respect of international and local requirements including customs and tax regulations, embargoes and export control measures.

## Responsible material sourcing

In recent years, there has been increasing international focus on "*conflict minerals*" emanating from mining operations in the Democratic Republic of the Congo (DRC) and adjoining countries. Armed groups engaged in mining operations in this region

are believed to subject workers and indigenous people to serious human rights abuses and are using proceeds from the sale of "conflict minerals" to finance regional conflicts.

The most common minerals are tin, tantalum and tungsten (known as the 3Ts), and gold. These are used in a wide range of electronic products.

The Scolmore Group is committed to sourcing components and materials from companies that share our values regarding respect for human rights, integrity and environmental responsibility.

We carry out due diligence on our supply chain in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as Section 1502 of the US Dodd-Frank Act.

## Financial integrity

We conduct our business in an honest, fair and transparent way.

We are financially and fiscally responsible.

We ensure that the information we record is accurate, timely, complete and maintained in compliance with relevant legal and regulatory requirements.

All payments and transactions are properly authorised in accordance with Scolmore operating procedures and delegations of authority, and fully and accurately recorded in our books and records.

## Anti-money laundering

Money laundering is a process where funds generated through criminal activity – such as terrorism, drug dealing, tax evasion, human trafficking and fraud – are moved through legitimate businesses in order to hide their criminal origin. We are committed to conducting business in a way that prevents the use of our business transactions by those who might abuse them, so we comply with anti-money laundering, financial crime and antiterrorism laws in all countries where we operate.



# Business integrity

## Preventing corruption

The Tenth Principle of the UN Global Compact states that "Businesses should work against corruption in all its forms, including extortion and bribery."

Corruption is a considerable obstacle to economic and social development around the world. It has negative impacts on sustainable development and particularly affects poor communities.

For companies, corruption impedes business growth, escalates costs and poses serious legal and reputational risks. It also raises transaction costs, undermines fair competition, impedes long-term foreign and domestic investment, and distorts development priorities.

New and tougher anti-corruption far-reaching regulations continue to emerge worldwide.

## Our full commitment

We are committed to the practice of responsible corporate behaviour and to complying with all laws, regulations and other requirements which govern the conduct of our operations.

We are therefore fully committed to compliance with all anti-bribery and anti-corruption legislation including, but not limited to the Bribery Act 2010 (UKBA), and ensure that no bribes or other corrupt payments (including facilitation payments), inducements or similar are made, offered, sought or obtained by us or anyone working on our behalf.

## Definitions

**"Corruption"** is defined by Transparency International as *"the abuse of entrusted power for private gain."* Examples of this are:

- abuse of the power given to an individual by another person or organisation
- activity that's beyond the position or remit of a person
- benefits obtained for an employee's personal gain, rather than for their organisation

**"Bribery"** is a specific subset of corruption and is defined as the offering, promising, or giving of something to influence an official.

Examples of this include:

- payments to get a faster or better service, for example in clearance of goods or certifications
- payments made to gain advantage in public procurement processes
- offering, providing or receiving gifts, entertainment and hospitality or other items of value such as donations, sponsorships and internships
- levels of hospitality disproportionate to a business transaction

**"Facilitation payments and kickbacks"** are small payments made to officials in order to ensure or speed up the performance of routine or necessary functions.



## Gifts and hospitality

We expect all our employees to act with integrity and in a transparent and ethical manner.

While appropriate and reasonable gifts and hospitality (or promotional expenses) remain a legitimate part of conducting business and can strengthen business relationship, excessive gifts and hospitality aimed at obtaining improper advantages are never acceptable.

Care and due diligence must be exercised at all times when giving or receiving any form of gift or hospitality on behalf of Scolmore.

Three critical factors to consider when proposing to offer, or when being offered, gifts or hospitality are

among others: the **intention** behind the offer, its **value**, and its **timing**.

- The **Intention** behind the offer must always reflect good working relations and never be or be perceived as a way to induce improper decision making.
- The **Value** of the gift or hospitality shall be relatively modest in the context of the industry and in line with Scolmore's **Anti-Bribery** policy
- Gifts and hospitality offered at the **time** or during a tender or procurement process to people with decision making power require some scrutiny.

For more information, please refer to Scolmore's **Anti-Bribery** policy.

GIFTS AND HOSPITALITY	
✔ DOs	✘ DON'Ts
⇒ Comply with the Anti-Bribery policy	⇒ Seek or encourage gifts, gratuities, entertainment or other courtesies from anybody
⇒ Obtain pre-approval as required	⇒ Promise or give the impression that gifts or hospitality are in exchange of the award of a business, custom, contract.
⇒ Offer and accept gifts of reasonable or moderate value	⇒ Give or accept gifts in cash or cash equivalent
⇒ Report gifts and invitations given or received in compliance with the applicable policies and procedures	⇒ Give or accept gifts and hospitality at the time of contracts being tendered or awarded
⇒ Refuse firmly but politely any gift or entertainment offer which appears not in compliance with the Anti-Bribery policy	⇒ Offer gifts or entertainment to Public Officials
⇒ Contact the Legal and Compliance department if in doubt	⇒ Give or receive excessive gifts or entertainment

## Political donations

Scolmore does not make political donations and is not affiliated with any political party, independent candidate, or with any other organisation whose activities are primarily political.

Employees and other associated parties are free to make personal donations provided that such payments are not purported to be made on behalf of the business and are not made to obtain any form of advantage in any business transaction.

## Charitable donations

Charitable donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity.

All charitable donations must be fully recorded. Proof of receipt of all charitable donations must be obtained from the recipient organisation. Under no circumstances may charitable donations be made in cash.

No charitable donation may be made at the request of any party where that donation may result in improper conduct



## Conflict of interests

Our workforce is expected to always maintain the highest degree of integrity when dealing with our business partners and to act solely in the best interest of the **business**. A conflict of interest arises whenever an employee's personal interests compromise that employee's ability to fully and objectively perform their responsibilities for the benefit of **Scolmore**. The situations that generate this type of conflict usually involve an effort to obtain some sort of personal or family benefit, or the pursuit of an outside business interest, in a way that conflicts with the economic or reputational interests of the company. Our workforce is required to disclose actual or potential conflicts of interest to the Company, thereby allowing the Company to evaluate the situation





# Protecting our assets

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## Intellectual property

Workforce members are responsible for the protection and proper usage of assets and should take steps to avoid their damage, theft or unauthorised use. This includes all types of assets, including physical, intangible and financial assets, as well as intellectual property such as patents, trademarks, copyrighted works and trade secrets.

All staff members must protect non-public confidential information which, if disclosed, could cause harm to the business.

## Data protection

The world we live in is data-driven. Sharing data can make life easier, more convenient and connected for us all, both at home and at work.

Data Protection laws and regulations cover the protection of personal and private information. Data protection laws set out what should be done to make sure everyone's data is used properly and fairly.

We are committed to protect the personal data of our staff, our customers and clients, as well as other individuals who come into contact with our business.

We comply with the Data Protection principles incorporated in the UK GDPR and GDPR.

## Cyber-security

We protect personal as well as other confidential data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

With the rise in increasingly tailored ransomware attacks, Scolmore implements and constantly reviews measures aimed at avoiding cyber-attacks including maintaining up-to-date, isolated, offline backup copies of all important data as well as staff cyber-security staff training and awareness campaigns.

## Social media

Scolmore recognises that the internet provides a unique opportunity to participate in interactive discussions and share information on particular topics using a wide variety of social media

However the use of social media can pose risks to our confidential and proprietary information and reputation.

We expect our workforce to understand and adhere to the principles and requirements set forth in this Code in any setting that may affect the Company, either at work or after hours.





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