



Business Ethics Policy Statement

“Building trust through ethical practice”

We are committed to maintaining the highest standards of ethics and integrity in all aspects of our business operations. This Business Ethics Policy outlines the principles and standards that guide our conduct, ensuring we act legally and ethically in our dealings with employees, customers, suppliers, and other stakeholders. Our commitment to ethical conduct underpins our reputation, operational excellence, and the trust we inspire in those with whom we do business.

The scope of this policy applies to all employees and directors of HSQE Ltd, as well as contractors and consultants acting on our behalf.

Standards of Conduct

- **Bribery and Corruption:** We uphold a zero-tolerance policy towards bribery and corruption. All employees are prohibited from offering, giving, soliciting, or accepting any form of bribe or improper payment. We comply with all applicable anti-bribery and corruption laws, including but not limited to the UK Bribery Act.
- **Confidentiality:** Confidential information, including proprietary, technical, business, financial, and personal data, must be safeguarded. Employees are required to avoid disclosing confidential information without proper authorisation or outside the scope of their duties.
- **Conflicts of Interest:** Employees must avoid situations where personal interests could conflict, or appear to conflict, with the interests of HSQE Ltd. Any potential conflicts of interest must be disclosed to management immediately.
- **Customer Relations:** We are committed to dealing fairly and honestly with our customers, providing high-quality services and products, and ensuring customer satisfaction and safety.
- **Data Protection:** We adhere to all relevant data protection laws and regulations, ensuring the confidentiality and integrity of personal data we collect, use, and store. Employees are required to protect data according to our Data Protection Policy.
- **Environment:** We are committed to environmental stewardship. We strive to minimise our environmental impact and promote sustainability in our operations and supply chain.
- **Gifts, Entertainment, and Improper Payments:** Employees must not accept or offer gifts, entertainment, or any other benefits that could influence, or appear to influence, decision-making processes. All gifts and hospitality given or received must be transparent, modest, and recorded according to company policy.
- **Integrity:** We conduct our business with integrity, adhering to our ethical standards in all company activities and decisions. Honesty, fairness, and accountability are at the core of our business practices.
- **Malpractice:** We have a zero-tolerance approach to malpractice and are committed to acting ethically and with integrity with all business dealings and relationships. We require the reporting of any illegal or unethical behaviour and protect those who raise concerns in good faith. Retaliation against individuals who report malpractice is strictly prohibited.
- **Whistleblower Protection:** We aim to foster a culture where employees feel safe to report unethical or illegal activities without fear of retaliation.
- **National and International Trade:** We comply with all applicable trade laws and regulations, including export controls, sanctions, and anti-boycott regulations.
- **Personal Conduct:** Employees are expected to behave professionally and respectfully at all times, upholding HSQE Ltd's values and contributing to a positive workplace environment.
- **Political Activity:** We are politically neutral. Employees must ensure their personal political activities do not interfere with their responsibilities to the company or imply endorsement by HSQE Ltd.
- **Stakeholders:** We are committed to engaging with our stakeholders transparently and ethically, considering their interests and feedback in our business decisions.
- **Supply Chain:** We expect our suppliers and partners to adhere to ethical business practices consistent with our own. We are committed to fair labour practices and human rights within our supply chain.
- **Compliance and Reporting:** All employees are responsible for understanding and complying with this policy. Any violations or suspected misconduct should be reported immediately to their line manager.

Implementation and Monitoring

- **Accountability:** The Managing Director is accountable for this policy. Along with the management team, they will oversee the implementation and monitoring of this policy.
- **Enforcement:** Violations of this policy may result in disciplinary action, up to and including termination of employment. HSQE Ltd will investigate all reported concerns thoroughly and confidentially.
- **Review and Update:** This policy will be reviewed annually and updated as necessary to reflect changes in laws, regulations, and business practices.

Our commitment to ethical conduct defines HSQE Ltd's and our approach to business. By adhering to this Business Ethics Policy, we aim to maintain the trust of our stakeholders and uphold our reputation as a responsible and ethical business leader.



Original Signed

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John Constable
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