



ETHICS POLICY STATEMENT OF Ergonomic Solutions International Limited and Subsidiary Companies

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

Guiding Principles

As one of our core Values is Integrity, by which we mean to be honest and ethical in our actions, communications and our use of resources. The following principles provide the ethical framework to which we aspire and applies to all those of above. Our principles are:

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, race, colour, nationality, ethnic or national origin, religion or belief, disability or age.
- We will not tolerate any bullying or abuse, no matter what form it may take, verbal or non-verbal, in person or via the internet. This includes all inappropriate or unwelcome sexual advances or behaviours.

In our work

- Operate with honesty and integrity in all our work, taking steps to identify and deal with corrupt business practices and professional misconduct.
- Be open and transparent in making decisions and undertaking activities on behalf of ES.
- Reach conclusions based on best business, commercial and professional practice, having considered all views.
- Comply with all relevant laws and regulations, for example:
 - 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 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)
- Employees, 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.

Impact on the environment

ES is committed to minimising the adverse impacts of our decisions and actions on the natural environment, on people and their welfare.

SCOPE

- 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.
- It covers all ES management and employees, consultants, directors, officers and agents in all offices and facilities wherever they operate.
- We expect those organisations that provide products, goods and services to us to respect this policy.
- We request customers, partners and distributors that we work with to respect our ethical positions.

Implementation

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 line managers or the Ethics Officer.

People should speak up to raise any concerns they may have about any instances which may not comply with this Policy to their line manager or the Ethics Officer. Serious or unresolved concerns should be referred to the Board Ethics Committee.

The Board Ethics Committee and monitoring procedures

The Board Ethics Committee will be a small team comprising the Chairman and three Board members, of whom at least one is a Non-Executive Director. Serious issues which cannot be resolved via existing mechanisms may be referred to the Board Ethics Committee at any time. Breaches of the policy which cannot be dealt with by line 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 ES Directors will report annually on any ethical issues or activities through the normal audit procedures to ensure our policy is being applied consistently.

Breach of the Policy

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

ES may terminate its commercial relationship with any suppliers, contractors, agents, distributors and partners if they breach this policy.