



Code of Ethics

We are committed to conducting business in an ethical manner. All our trading activities with employees, customers, shareholders and suppliers must be conducted with honesty and integrity, and in accordance with the law of each country in which we operate. We are respectful of all fundamental human rights and committed to combating fraud and corruption. All employees must carry out their duties in a fair and professional manner, and not undertake any actions that could put our good reputation at risk.

Code ownership

Each country board is responsible for setting up, enforcing compliance and dealing with any breaches of the Code.

Implementation

Our Code of Ethics is implemented in each country of operation. Each board is responsible for setting up minimum standards appropriate to their local market, laws and cultures. They must also enforce compliance and deal with any breaches.

The Code covers confidentiality, illegal and improper activity, potential conflicts of interest, claiming of expenses, authorised use of group funds, facilitating payments, receipt of gifts and corporate hospitality.

The group also has a whistle blowing policy allowing employees to raise concerns over any aspect of unethical behaviour with the Company Secretary. The policy is communicated to all employees and agents in their induction programme.