

ETHICS AND CONDUCT POLICY

8th September 2022

This Ethics and Conduct Policy applies to Acrow Group, and to all of its personnel, representatives and distributors.

A. Our Policy

We are committed to acting professionally, ethically and in compliance with the law in all our business activities wherever we operate.

This is more than just following rules. As well as complying with laws, we must apply our principles and values. We must ask ourselves, "Is this the right thing to do?"

B. Our commitments

The following commitments must be complied with by Acrow Group, and by all of its personnel, representatives and distributors.

Laws

We will comply with all laws in all jurisdictions in which we operate.

Criminal activity: We prohibit, and will not participate in, any form of criminal activity, including but not limited to the following:

- We will not offer, give, solicit or accept bribes or other improper benefits, either directly or through any third party.
- We will not defraud or deceive anyone or act dishonestly.
- We will not make facilitation payments.
- We will not participate in any other criminal activity, such as extortion, cartels, abuse of power, embezzlement, or money laundering.

Conflicts of interest

We will declare and not participate in situations in which our personal interests, or those of our families, could conflict with Acrow Group's best interests.

Slavery and Human Trafficking

We will take all appropriate steps to ensure that there is no modern slavery or human trafficking in any part of our business activities.

Health and safety

We will take all appropriate steps to ensure the health and safety of everyone who works for or with us, and of the public who use our products.

Quality

We will supply products and services to the standard and quality that meet the customer's requirements.

Protecting the environment

We will take all appropriate steps to undertake our business in a sustainable and environmentally responsible manner.

Equal opportunity and diversity

We will treat everyone equally and encourage diversity.

Harassment, bullying or discrimination

We will not tolerate any kind of harassment, bullying or discrimination against anyone who works for us or with us.

Management procedures

We will comply with all management procedures implemented by Acrow Group which are designed to ensure compliance with this policy.

C. Acrow Group commitments

The following commitments must be complied with by Acrow Group.

Supporting personnel, representatives and distributors

We will support all our personnel, representatives and distributors in doing what is right. No one will be penalised for making the ethically correct decision.

Subsidiaries and affiliates

We will ensure that all of our subsidiary and controlled organisations comply with this policy.

Relationships with third parties

We will only work with organisations that conform to standards consistent with our own.

Procedures

- We will implement appropriate procedures designed to ensure compliance with this policy, and to detect, report and deal with any breach which may occur.
- We will monitor the effectiveness of these procedures, and will implement any improvements which are necessary to enhance their effectiveness.
- We have established a Business Ethics Committee and have appointed a Compliance Manager, who have the necessary authority and independence to oversee compliance with the anti-corruption aspects of this policy and our procedures.
- Our procedures will annually be independently certified as compliant with ISO 37001.

Training and advice

We will provide appropriate guidance and training to our personnel, representatives and distributors so that you understand this policy and procedures.

Enforcement action

It is vital that this policy and procedures are complied with. We will take appropriate action in the event of any non-compliance. A breach of this policy or procedures may result in disciplinary action for personnel, and termination of appointment for representatives and distributors.

D. Guidance

If any personnel, representatives or distributors need any advice or guidance on any aspect of this policy or supporting procedures, you may contact the Head of Ethics Compliance, Keith Mills (keith.mills@mabeybridge.co.uk).

E. Reporting

- If you believe that there has been any breach of, or is a weakness in, this policy or supporting procedures, you must report immediately to your appropriate Acrow Group manager, or to the Head of Ethics Compliance, Keith Mills (keith.mills@mabeybridge.co.uk).
- Alternatively, you can report to our independent reporting service: [NAVEX](#). You may if you wish report confidentially or anonymously.
- We will always follow up a report and take appropriate action.