



ETHICAL BUSINESS POLICY STATEMENT

ETS Group is committed to maintaining the highest standards of ethics and integrity and to conducting our business legally, honestly and fairly and requires all our employees to carry out their duties in accordance with these principles.

The Company's attitude to bribery, fraud, dishonesty, illegal or improper activity amongst its employees, partners, subcontractors or suppliers is that of zero tolerance. To this end our objectives are to:

- Comply with all laws applicable to our business activities.
- Ensure that business activities are conducted in an ethical manner.
- Maintain and protect the Company reputation with our Clients, suppliers, contractors, employees and all other parties with whom the Company has dealings or who may be affected by our activities.
- Act within the codes of conduct and ethics of the pertinent professional institutions such as:
 - Institution of Civil Engineers (ICE).
 - Institution of Mechanical Engineers (IMechE).
 - Institution of Engineering and Technology (IET).
 - Chartered Institute of Management Accountants (CIMA)
 - Royal Institution of Chartered Surveyors (RICS).

In pursuit of these objectives ETS Group will ensure that our policies, procedures and practices are open, fair and equitable for all parties involved.

Bribery and Fraud

The Company will –

- Actively ensure full compliance with all statutory regulations.
- Ensure that all employees understand their responsibility for the deterrence and detection of bribery and fraud and that in carrying out their duties and responsibilities they protect the assets and resources of ETS Group clients, partners, subcontractors and suppliers.

- Not make, offer or agree to make any unlawful payment, bribe or other corrupt payment to any Client, regulatory authority or public official including their employees, agents and representatives.
- Develop and maintain effective controls to prevent bribery, fraud and improper behaviour. This includes identifying the risks within the Company and implementing systems and procedures to control those risks.
- Liaise with third parties, in particular, partners, subcontractors and suppliers to ensure that they conduct their business in accordance with the principles of this policy statement.
- Encourage all employees to report to senior management, any suspicions they may have of fraud or improper/irregular behaviour.
- Investigate any report of suspected fraud or improper/irregular behaviour and, where appropriate, report this to the relevant authorities.
- Take appropriate legal action to ensure that any Company assets, which have been improperly or fraudulently obtained, are recovered.
- Take appropriate disciplinary action against the perpetrators of bribery, fraud or improper behaviour.

Competition and Unethical Practices

The Company will not -

- Engage in any business practice which is unethical or amounts to unfair competition, for example:
 - Unlawfully or inadvertently acquire, use or disclose to any third party (unless required to disclose by law or any regulatory authority having jurisdiction over the ETS Group) any proprietary information or intellectual property of another party.
 - Engage in any activity or business practice whether unilaterally or in conjunction with any other party which is in breach of any applicable competition and/or anti-trust law in the relevant jurisdiction.
 - Unlawfully induce any party to breach a contract with any third party.
 - Make false statements about a competitor's products and/or services.

Confidentiality and Data Protection

The Company will -

- Protect confidential information in its possession from unauthorised use or disclosure, including confidential information relating to its Clients, suppliers, contractors and employees.

- Comply with the provisions of confidentiality undertakings which ETS Group enters into in relation to potential acquisition targets, joint ventures and collaboration arrangements.
- Comply with relevant data protection legislation affecting its acquisition, maintenance and use of confidential information whether held electronically or otherwise.

Conflicts of Interest

- Personnel will avoid conflicts between their personal interests (and those of parties connected with them) and their duties and responsibilities to ETS and its Clients, suppliers, contractors, employees and other third parties.

Protection and Ownership of Assets

This applies to resources both in the form of tangible assets and intangible assets such as computer systems, bespoke processes, software, intellectual property, trade secrets and confidential information.

These resources shall not be used for any other purpose than for ETS or their Clients' business. They shall not be used for unauthorised or unlawful purposes or for personal gain

Accounting Systems and Procedures

- All accounts and records will be documented in a manner that clearly identifies and describes the true nature of business transactions, assets or liabilities, and properly and promptly classifies and records entries in conformity with Generally Accepted Accounting Principles and standards (GAAP), including FRS102.
- No record, entry or document shall be deliberately false, distorted, misleading, misdirected, incomplete or suppressed.
- Accounting records will be retained as required by law or GAAP.
- The Company will maintain expenses procedures that allow regular auditing and ensure the business knows that expenditure is incurred wholly and necessarily in the course of business.

Legal Compliance

- ETS Group comply with all relevant legal requirements in so far as they apply to the activities of the Company.

Administration of the Ethical Business Policy

The Board of Directors shall assume responsibility for Governance and Compliance requirements and the implementation of this policy. The Board shall review, on an annual basis, the implementation and effectiveness of this Policy and shall ensure that:

- Personnel within the relevant business units are made aware of the Ethical Business Policy.
- All new personnel are made aware of the Policy and given training or guidance on its operation.

Non-Compliance

- The Board places the highest importance on the successful implementation of this Policy and ongoing compliance with its terms. All personnel will be required to adhere to the spirit as well as the letter of this Policy whether in its initial form or as amended from time to time by the Board.
- Non-compliance with the Policy will be deemed to be a breach of the relevant contract of employment or contract with the relevant party. Non-compliance by employees will give rise to disciplinary proceedings which may result in dismissal for gross misconduct. Non-compliance with certain aspects of the Policy may also give rise to criminal proceedings.

All instances of non-compliance with this Policy should be reported to the Director in charge of Governance and Compliance or Managing Director. All communications will be held in confidence and, if requested, can be on an anonymous basis.

For ETS Group



Mark Cole

Managing Director

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