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BUSINESS ETHICS POLICY

NES Fircroft is committed to maintaining the highest standard of ethics and integrity in the conduct of its business. We embrace our core values throughout global operations and shall act in the best interests of the business at all times.

Our Business Ethics policy outlines the expectations and responsibilities of NES Fircroft employees and business partners to help achieve our obligations in preserving the trust and confidence of our Stakeholders, and to ensure our business complies with defined requirements across our global operations.

The basic principles of this Policy are to:

- Highlight the importance of maintaining NES Fircroft's reputation for dealing with its employees, customers, suppliers and competitors fairly and legally;
- Communicate the values and standards that should govern the behaviour and decisions of NES Fircroft employees and business partners;
- Create an environment where employees are confident that their actions on behalf of NES Fircroft are ethical; and
- Encourage and promote corporate social and responsibility throughout the organisation.

While the standards in this Policy are mainly based on compliance to applicable laws, they also reflect the values which define NES Fircroft and its employees.

SCOPE OF THE POLICY//

This Policy forms part of the NES Fircroft Governance and Compliance Framework and applies to all NES Fircroft employees, its business partners and as applicable any contractors and workers engaged by NES Fircroft who provide services to clients. All such persons are expected to comply with this Policy and to use their best endeavours to ensure that all of its operations comply with the legal requirements of any geographic region in which it operates, in accordance with local cultural customs, NES Fircroft core values, and in agreement with the NES Fircroft Schedule of Management Authority (SOMA).

The NES Fircroft Board has overall responsibility for the Policy and for the development of supporting practices and procedures.

Directors of subsidiary companies are responsible for communicating the Policy to employees and that contents and expectations are understood and followed throughout their respective companies.

All employees are encouraged to report any actions or events that are or may appear to be in breach of any aspect of this Policy, in accordance with the Business Incident procedure or Whistleblowing Policy, without fear of reprisal.

The Policy will be reviewed annually by the QHSE division.

While it is impossible for NES Fircroft to numerate all situations in which actions would be deemed as unethical, NES Fircroft requires its employees and other third parties to use good and reasonable judgment when conducting business.

BRIBERY & CORRUPTION//

NES Fircroft work in compliance to the Bribery Act 2010 and conduct business with integrity, and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. Whilst some of the sectors and geographical locations that NES Fircroft works in are perceived to be high risk areas for practices such as corruption and bribery, NES Fircroft continues to have a zero-tolerance approach to corrupt practices in any form, or any illegal or non-compliant behaviour, wherever it may occur.

Our Anti-Bribery and Corruption Policy sets out how NES Fircroft will maintain high standards and how our practices and expectations extend to those to whom NES Fircroft wish to do business with.

HOSPITALITY & GIFTS//

It is rare for NES Fircroft to be involved in the giving or receiving of hospitality or gifts, and they definitely will not be offered if it is against the corporate policy of a client or local law or custom.

The Hospitality & Gifts Policy provides guidance to NES Fircroft employees when considering whether to offer or accept any form of gifts or hospitality and encourages employees to adopt a questioning attitude to consider the context in which the hospitality or gift is being given or received, and the approvals that are required.

Any hospitality or gift that NES Fircroft gives will be reasonable, proportionate, in good faith and connected with legitimate business.

If it appears the intention behind any hospitality or gift offered to NES Fircroft is to influence improper behaviour, that employee should politely refuse. If a client or business partner feels any hospitality or gift offered by NES Fircroft is inappropriate, then they should decline without feeling they need to explain why.

HUMAN RIGHTS//

NES Fircroft promote respect for, and protection of human rights throughout the business and will not take part in any activity that involves human rights abuses nor be complicit in activities that solicit or encourage such abuses. NES Fircroft works to ensure the protection of employee rights and in turn expect our employees to respect the rights of others.

Our Human Rights Policy defines standards and expectations of NES Fircroft, its employees and business partners, and responsibilities in relation to the rights and treatment of others.

FORCED LABOUR & HUMAN TRAFFICKING//

Personal integrity and responsibility are the foundation of our business; we differentiate our solutions on the basis of compliance, integrity and responsibility, and in accordance with local and international laws. Within this context, NES Fircroft does not tolerate practices involving slavery, servitude, forced or compulsory labour, or human trafficking. We are committed to these principles and to taking all reasonable steps and to ensure that slavery and human trafficking practices are not taking place within our business, that of our partners or the ensuing supply chain.

NES Fircroft's approach to tackling modern slavery is defined within our [Modern Slavery statement](#).

EQUALITY & DIVERSITY//

NES Fircroft embraces diversity and promotes the benefits of diversity to all employees and clients in all of its business activities. We will work to develop a business culture that reflects that belief and have widened the media in which it recruits to ensure as diverse an employee and candidate base as possible.

NES Fircroft will review on an on-going basis all aspects of its recruitment to avoid unlawful or undesirable discrimination and ensure adherence to the Equal Opportunities and Diversity Policy at all times and will strive to make sure that our clients meet their own diversity targets. NES Fircroft will treat everyone equally irrespective of gender, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or membership or non-membership status within a Trade Union or spent convictions.

NES Fircroft places an obligation upon all employees to respect and act in accordance with the Equal Opportunities and Diversity Policy.

WORKING CONDITIONS//

Individuals are entitled to work in an environment and under conditions that respect their rights and dignity, be free from harassment or other kinds of intimidating or offensive situations and be awarded with just conditions relating to their employment.

NES Fircroft workplaces should be a safe and positive environment and we expect professionalism and respect from all stakeholders in the spirit of our core business values. In all instances, employees are provided with a written contract of employment inclusive of agreed terms, notice periods, working times, annual leave, salary payments and comparable provisions in accordance with the legislation of the country where they work.

CHILD LABOUR//

NES Fircroft does not employ child labour, does not use Suppliers which employ child labour and ensure that all our employees are above the legal employment age in the country of their employment. Should evidence of child labour be discovered across our global operations, or during the course of a business relationship with an external partner, supplier or agent, appropriate remedial steps will be taken with the best interest of the child in mind.

ACCOUNTING STANDARDS//

All accounts and records must 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.

No record, entry or document shall be deliberately false, distorted, misleading, misdirected, incomplete or suppressed. The retention or proper disposal of NES Fircroft records shall be in accordance with established corporate policies and applicable legal and taxation requirements.

TAXATION//

NES Fircroft always aims to be tax compliant and our tax policy reflects and supports our business by ensuring a sustainable tax rate, mitigating tax risks in a timely and cost efficient way and complying with rules and regulations in the jurisdictions, including the UK, in which NES Fircroft operates.

Each NES Fircroft subsidiary works closely with reputable, local tax advisors to ensure it understands local tax risks and obligations in respect of all applicable direct and indirect taxes, and to ensure payments and filings are made on time and in full.

NES Fircroft's policy and approach to taxation and tax risk is defined with our [Taxation Strategy](#).

CONFLICT OF INTEREST//

Employees should avoid conduct which would be detrimental to the best interests of NES Fircroft or its clients and shall ensure they do not enter into any situation in which their personal or financial interests may potentially or actually conflict with those of NES Fircroft or its clients by giving rise to personal benefit or cause embarrassment and / or damage to the reputation, name or goodwill of NES Fircroft or its clients.

Where any potential conflict of interest may arise, the employee must promptly declare that interest in writing and seek advice from their business Director.

RESPONSIBLE PROCUREMENT//

NES Fircroft follows the Ethical Trading Initiative (ETI) Base Code and compliance with applicable laws. As a minimum NES Fircroft promotes responsible procurement which includes that:

- Employment is freely chosen;
- Freedom of association and the right to collective bargaining are respected;
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practiced;
- Regular employment is provided;
- No harsh or inhumane treatment is allowed.

COMPETITORS & FAIR COMPETITION//

NES Fircroft supports laws prohibiting restraints of free trade and unfair practices.

Employees will not:

- Wrongfully induce a competitor's client to break a contract with that competitor;
- Commit industrial espionage to acquire a competitor's trade secrets; or
- Make false or disparaging comments about a competitor's products or services.

SANCTIONS//

The multi-jurisdictional nature of NES Fircroft operations means that compliance with Sanctions Laws is a core component of our compliance obligations. Sanctions applicable to our business apply to all group businesses and employee are expected to be aware of the sanctions that apply in relation to the country, business entity or activity they operate in.

Sanctions guidelines are available accompanied by awareness modules as part of the NES Fircroft governance and compliance framework.

The controls appointed by NES Fircroft include, but are not limited to:

- Guidelines on sanctioned countries

- Sanctions procedures and reporting facilities
- Due-diligence questionnaires for new opportunities
- Appropriate screening on placements, banks, and suppliers
- Enhanced approval levels associated with new subsidiaries, acquisitions, joint ventures or travel plans.

ESG//

Understanding where we fit and engage with the world is key which is why we conduct business responsibly by aligning our strategies and operations with the UN Ten Principles on human rights, labour, environment and anti-corruption. NES Fircroft's vision is to lead the way, providing employment opportunities for local communities, and minimising our impact on the environment, to ultimately deliver a brighter tomorrow.

Our values speak to our commitment to advancing initiatives across Environment, Social and Governance (ESG) topics:

- **Environment:** We support projects driving carbon neutral initiatives across the globe. We are accredited as an ISO 14001 EMS business and strive to minimise the environmental impact of our business year on year.
- **Social:** People come first. We work every day to empower our staff, offer equity and employment opportunities and to create an inclusive and diverse workplace. We respect the fundamental human rights of everyone in our supply chains.
- **Governance:** Our corporate governance framework fosters continuous improvement, informed and effective decision-making, and unrivalled compliance.

QUALITY ASSURANCE//

Quality is key driver within NES Fircroft and is incorporated to business operations and strategy.

As a framework for our Management Systems, Quality supports the businesses governance, compliance and improvement ethos to support sustainable growth.



Our QHSE Policy details our commitment for a quality assured service.

The following statements proclaim our expectations of employees in respect to quality assurance:

- NES Fircroft believes that customer service quality must be established and assured right from the initial approach;
- NES Fircroft's reputation is very dependent on agreeing and defining clear and measurable service levels;
- ISO 9001 compliance is assured; certification is monitored through a nationally accredited body and compliance through internal reviews; and
- Adherence to NES Fircroft policies and the practices of continuous improvement by monitoring performance, service levels and customer feedback is a duty required of all employees.

INTEGRATED MANAGEMENT SYSTEM//

The NES Fircroft Integrated Management System (IMS) allows the business to demonstrate its ability to provide a consistent service that meets customer and legislative requirements. Our practices ensure continuity and best practice is delivered to achieve customer satisfaction by mitigating risk exposure and continually looking for improvement opportunities. The fundamental principles of the NES Fircroft IMS apply across the global business and instils a culture based on excellence and continual evaluation, ensuring that:

- a risk-based approach is applied to our service processes;
- requirements associated with industry, regulation or business are fully understood and achieved;
- Nothing important is left out; and that
- Stakeholders are clear about their responsibilities and actions;

The NES Fircroft IMS is aligned to the international standards of:

- ISO 9001:2015, Quality Management;
- ISO 45001:2018 Occupational Health & Safety; and
- ISO 14001:2015 Environmental Management.

DATA PROTECTION & CONFIDENTIALITY//

As an organisation, NES Fircroft has a need to process accurate personal information about individuals in order to provide an effective and efficient service. As such, the protection of data is a significant part of our daily security measures, ensuring that data is handled confidentially and compliantly, to ensure business continuity, and to minimise or prevent impacts of any incidents, whether these are accidental or deliberate, internal or external.

NES Fircroft's obligations and approach to the protection and use of Personal Data is defined within our **Data Protection Policy**.

OCCUPATIONAL HEALTH & SAFETY//

NES Fircroft regards the safety and wellbeing of all its employees as a high priority and will take the required steps to ensure that its health and safety responsibilities continue to be met at all times. Our aim is to provide the safest working conditions possible and to ensure, so far as is reasonably practicable, that the health, safety and welfare of its employees is sustained, as is the health and safety of any other persons who may be affected by its activities.

Occupational Health & Safety (OHAS) practices are embedded across the business; aligned to standards defined by ISO45001 our operational activities, locations, and obligations are defined and regularly monitored for risk or improvement opportunity, and to ensure compliance obligations associated with our services and staff are maintained at all times.

Employees are provided with the necessary equipment, information, training and supervision to implement their role safely and in also have a duty to maintain high OHAS standards by conducting their roles safely, responsibly, and in accordance with policy content.

ENVIRONMENT//

NES Fircroft is increasingly determined to achieve and demonstrate sound environmental performance by assessing and controlling the impact our operations have on the environment.



We recognise that good housekeeping is an effective way to manage such environmental and energy conservation matters and base our strategy on environmentally sustainable practices to reduce carbon footprint and improve environmental performance.

Aligned to the international standard, ISO14001, our environmental principles support NES Fircroft in its endeavour to:

- Protect the environment and respond to changing conditions; and
- Monitoring performance in order to create opportunities that contribute to sustainable development
- Comply with applicable legal requirements which relate to environmental aspects;
- Reduce waste through re-use, recycling or conservation practices;
- Enhance environmental performance
- Communicate with employees on environmental matters; and
- Integrate environmental considerations into day-to-day activities.

Employees are asked to familiarise themselves with business policy and, wherever possible to reduce waste, use recycling facilities and unnecessary travel and to

consider the environment when making purchasing or operational decisions.

QUERIES, REPORTING SUSPICIONS AND INVESTIGATING//

NES Fircroft has procedures in place to enable employees to report instances or concerns relating to unethical practices, including unacceptable behaviour, bribery, corruption, human rights, including modern slavery, and policy breaches in a confidential manner.

Employees can raise any such concerns with their line manager or their preferred HR contact or can raise a business incident report through the normal channels. These methods of should be able to agree a way of resolving (or escalating) concerns quickly and effectively conduct appropriate investigations with the parties concerned. If an employee does not feel comfortable using these routes, they can safely, confidentially and anonymously (if they wish) report an issue via the NES Fircroft Whistleblowing Portal.

NES Fircroft will ensure that any concerns raised through any of the above channels are investigated appropriately and confidentiality. Any identified instances of unethical or unacceptable practices will be dealt with in a timely and effective manner.

Ian Campbell

Director of Risk

Signed on behalf of the NES Fircroft group business

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