

# POL04 ETHICS POLICY

# Competence – Reliability – Openness - Humility

Hardtech HV Ltd subscribes wholeheartedly to the values laid down in the System Engineering Group code of conduct.

All our employees have a responsibility towards the company and its secure future. Therefore, all employees recognise and live by the values and culture of the company as prescribed by the statements contained in the brand guide and our code of conduct.

We believe in openness, honesty, and maintaining high ethical standards that are crucial to the success of our business. Hardtech HV Ltd is committed to providing customers with the highest quality projects and services and aspire to the highest standards of social responsibility and ethical conduct.

It is important to recognise that we encourage all our partners, suppliers, sub-contractors and customers to aspire to the message in the Code of Conduct and in this code of ethics.

## 1. Legal standing

### a. Respect for laws and regulatory requirements

We actively adhere to and respect the legal and regulatory requirements applicable to our business both in the UK and other countries in which we work.

If we detect irregularities, extraordinary risks or criminal activity, we immediately inform the senior management team and highlight the issue to the relevant authority.

## 2. Social responsibility and the market economy

### a. Fair and equal non-discriminatory treatment

We do not discriminate against or show preferential treatment towards disability, race, colour, language, sex, religion, ethnicity and social standing or political background when conducting business with all stakeholders.

We stick to the facts and behave responsibly and professionally when dealing with suppliers and partners.

We ensure that all suppliers and partners are selected solely on the basis of their approach and ability to meet the requirements of our customers and maintain the interests of Hardtech HV Ltd.

### b. Free and competition-based socially responsible markets

We recognise and comply with anti-trust and bribery and anti-corruption legal requirements.

We do not accept gifts or gratuities that may lead to unfair advantage in business and transactions affecting our customers, partners and suppliers.

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We do not engage in price-fixing or exchanges of information that will affect our business, customers and suppliers.

We do not encourage or foster dissent against our customers, partners and suppliers.

We do not accept or make formal or informal agreements with the competition that may result in unfair dealing and potentially endanger market conditions.

## 3. Protecting the health, safety and welfare of our people and others

a. We have a legal responsibility and duty of care to ensure the health, safety and welfare of our employees, partners and others affected by the nature of our business and acts or omissions of work under our control.

b. All our employees are aware of their legal requirement and will highlight issues where there exists the potential for improvement in health, safety and protection of welfare rights and conditions affecting our business and the requirements of the customer.

## 4. Protecting the environment

a. We recognise and abide by the legal requirements for environmental protection both in the UK and in the wider global community.

b. We ensure that the products and other items we purchase are manufactured from sources inside the UK and Europe to minimise the impact on the environment and help to reduce the carbon footprint.

c. We have taken steps to ensure that products and components received from suppliers are not deemed to be conflict minerals originating from the Democratic Republic of Congo (DRC) or are Conflict Free by EICC standards.

## 5. Employment and freedom of association

a. All employees choose employment with our company freely and are not subject to external pressures, conditions or aspects inducing them to work in an unsafe manner.

b. We abide by the legal requirements in the UK and European Union for working hours and a fair working wage paid to all employees. We also ensure that regular and meaningful employment is provided.

c. We ensure that we do not employ children or young people considered underage or too young to work. We also do not engage in slavery or exploitation and mistreatment of others and actively discourage all such immoral practices. We communicate that this practice is recognised as socially unacceptable to all our partners and suppliers that this practice is recognised as socially unacceptable.

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d. We allow our employees to engage in freedom of association providing it does not result in conflict of interest or arise in conflict with the nature of the company.

Examples of conflict of interest:

- Accepting another position in addition to being employed by Hardtech HV Ltd.
- Awarding contracts to companies in which a financial interest exists (e.g. ownership, family members in management).
- Activities in supervisory boards of other companies.
- Significant ownership of shares in companies that are suppliers or competitors of our business.

Signed on behalf of Hardtech H.V. Limited



Phil McClennon  
Director  
Hardtech H.V. Limited

27/2/24