

ETHICS AND CORPORATE RESPONSIBILITY POLICY

1. POLICY STATEMENT

- 1.1 Tristel is committed to the practice of responsible corporate behaviour.
- 1.2 We apply high ethical standards and comply with all relevant legal principles when conducting business. Tristel applies those standards to its dealings with employees, customers, suppliers and others.
- 1.3 Staff have a shared responsibility to maintain a high level of ethical behaviour in their dealings with each other, customers, suppliers and others.
- 1.4 Staff are encouraged and supported to 'speak-up' and report, any situation which raises legal or ethical concerns in breach of this policy without delay.

2. WHO MUST COMPLY WITH THIS POLICY?

This policy applies to all individuals working at all levels of the Tristel Group, including senior managers, officers, directors, employees, consultants, contractors, trainees, part-time and fixed-term workers, casual and agency staff and interns. This policy uses the word "staff" to apply to all such persons.

3. WHO IS RESPONSIBLE FOR THIS POLICY?

- 3.1 The board of Tristel PLC has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 3.2 All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives to promote and maintain high ethical standards.
- 3.3 All staff are responsible for adhering to this policy and should comply both with what is written and with its general spirit and intent.
- 3.4 This policy does not form part of any employment contract or contract for service and we may amend it at any time.

4. SCOPE AND PURPOSE OF THE POLICY

- 4.1 This policy applies to everything we do, wherever we are doing business, anywhere in the world.

- 4.2 This policy is non-exhaustive, and all aspects of our business should be considered in the spirit of this policy.

5. HONESTY

- 5.1 Tristel believes that successful long term relationships are built on honesty, openness and fair play. All employees are expected to behave in this way and to take responsibility for their own actions and conduct.
- 5.2 No one has authority to require any employee to behave differently.

6. EMPLOYMENT, DISCRIMINATION AND HARASSMENT

- 6.1 Tristel aims to provide equal opportunities in employment, and that staff will be treated equally regardless of age, disability, gender reassignment, marriage or civil partnership status, pregnancy or maternity, race (including colour, nationality and ethnic or national origin); religion or belief, sex or sexual orientation). All staff will be treated with dignity and respect. We will take firm steps to ensure that the culture within our workplace actively tackles harassment and discrimination and promotes an ethos where any form of harassment, discrimination or breach of the company's Equal Opportunities policy is unacceptable. Acts of discrimination or victimisation will be dealt with in accordance with the Disciplinary Policy, if allegations are proven this may result in summary dismissal for gross misconduct.
- 6.2 Employees and workers will be made aware of their terms and conditions of employment or engagement from the outset. We offer unambiguous and fair terms of employment and provide employees with appropriate opportunities to develop their skills and progress in their careers. It is Tristel's intention to honour all applicable terms and conditions of employment.
- 6.3 Tristel recognises its duty, and the benefits, of providing working conditions which promote good health, safety and environmental practices. Policies in relation to these matters are made available to all staff. Staff are expected to read those policies and abide by them.
- 6.4 All staff are referred to our Equal Opportunities Policy and Anti-Bullying & Harassment Policy, which must be read and complied with at all times. The Company delivers training to relevant employees and managers on equality and diversity.
- 6.5 Tristel supports the elimination of all forms of forced or compulsory labour and the abolition of child labour in line with The Modern Slavery Act 2015.

- 6.6 There must be no victimisation or retaliation against staff who 'speak-up' against wrongdoing. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure. Any such concern of retaliation or victimisation can be raised under the Grievance Procedure.

7. HEALTH AND SAFETY

We are committed to providing a safe and healthy working environment for all staff. Employees are encouraged to recognise their duty to act in a responsible manner in the work place, having due regard for the health, safety and general welfare of their colleagues. All staff are expected to adhere to the Health and Safety Policy. The Company delivers regular and mandatory health and safety audits and training.

8. CONDUCT AND BEHAVIOUR STANDARDS

- 8.1 There must be no victimisation or retaliation against staff who 'speak-up' against wrongdoing. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure. Any such concern of retaliation or victimisation can be raised under the Grievance Procedure.
- 8.2 Employee honesty and integrity are essential to ethical business practices. All staff are under a duty to report their own (and that of others) mistakes and wrong doing in order that Tristel can address the situation.
- 8.3 If staff find themselves in a situation in which Tristel's interest's conflict with their personal interests they must report that to Tristel immediately. If in doubt, you are encouraged to raise this and discuss the same with us as soon as possible.
- 8.4 Staff are required to adhere to our Anti-Bribery and Corruption Policy at all times.

9. COMPLIANCE WITH THE LAW

- 9.1 It is our policy to comply with the laws, rules and regulations of the countries in which we operate. Where there is a conflict, where those laws are less stringent than this policy then we will comply with this policy (and all associated policies and procedures set out from time to time). Where the local laws are more stringent than this policy we will comply with local laws.
- 9.2 In the event that staff have any doubts or concerns about their duties, obligations or about legal compliance they should contact their line manager for guidance.

10. ETHICS IN THE MARKET PLACE

- 10.1 The truth, properly told and presented, should be the objective of all promotional activity. We will take all reasonable care to avoid misleading statements, concealment and overstatements in our promotional activity. Customers should be treated with respect and competition with competitors should be fair and ethical.
- 10.2 Complaints from customers, suppliers, sub-contractors, advisors or representatives should be dealt with promptly and fairly.
- 10.3 Although we strive to know and understand our competitors so that we can perform in the market, industrial espionage is not permitted. We will always compete lawfully and we will not seek to damage the reputation of our competitors.
- 10.4 Tristel is not to knowingly infringe on the copyright, trademarks, patents or other property registered intellectual property rights of others.
- 10.5 Collaboration with competitors to establish or maintain prices or to unlawfully restrain trade is not permitted.
- 10.6 Information received by staff will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given. We will at all times ensure compliance with all applicable requirements of data protection legislation in force from time to time.

11. SUPPLIER AND PARTNER

Tristel expects all suppliers and Partners to work towards and uphold similar ethical and moral standards. Tristel are actively scrutinising their supply chain to ensure ethical practices where practicable. We reserve the right to investigate the ethical record of potential new suppliers before entering into any agreement. We also reserve the right to withdraw from any agreement or other arrangement with any supplier or Partner who is found to have acted in contravention of the spirit or principles of this policy.

12. BRIBES

- 12.1 All forms of bribery are strictly prohibited. Staff are prohibited from giving, offering or accepting any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received. Gifts and hospitality are not prohibited provided such is for legitimate purposes and are not unduly lavish or extravagant.
- 12.2 All staff are required to read our Anti Bribery and Corruption Policy, which must be complied with at all times. Any employee who breaches this policy will face disciplinary

action, which could result in dismissal for misconduct or gross misconduct and we may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

13. INVOLVEMENT IN THE COMMUNITY

Tristel aims to be a responsible Partner within the local communities in which it operates. Its operations will be designed to avoid harm or inconvenience to local communities wherever possible.

14. SUSTAINABILITY

- 14.1 Tristel is committed to operate in an environmentally and socially responsible manner. As an absolute minimum, we will ensure that we meet all applicable environmental laws in whichever jurisdiction we may be operating.
- 14.2 We strive to keep the environmental impact of our activities to a minimum. We have created an Environmental Policy in order to help achieve this aim.
- 14.3 We seek to use resources efficiently to reduce environmental impact (including energy consumption, reducing paper consumption, reduce existence of use of single use plastic both within our operations and our products, and encourage recycling, reusing and repurposing wherever possible.
- 14.4 If you have any suggestions on how we can improve our carbon footprint please contact the Chief Financial Officer.

15. EMPLOYEES SHAREHOLDERS

- 15.1 Tristel supports the concept of employee shareholders. It is essential however that employee shareholder observe the guidelines in the share dealing code, which is available to all staff.
- 15.2 Financial advice involving investment in the company must not be given by or to employees.

16. COMMUNICATION WITH THE FINANCIAL COMMUNITY

Staff are not authorised to provide information regarding Tristel or its business to external third-parties, this includes but is not limited to persons working in financial services or the media (save where staff have prior written approval of a director of Tristel Plc).

17. WHISTLEBLOWING

All employees and workers are provided with a copy of our Whistleblowing Policy and are encouraged to raise concerns about wrongdoing and use the mechanism therein.