

# Arran Isle Limited and its Subsidiary Companies (“Arran Isle”) Code of Business Conduct Policy Statement

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## Introduction

The Arran Isle Code of Business Conduct sets out the basic principles that should be applied by all employees everywhere that we do business. However, these principles can never provide complete or detailed advice covering every situation; instead, they set a framework for how we should approach doing business.

## General Principles

Our activities generate economic benefits and our conduct should be a source of positive influence for those whom our business impacts. We will pursue our business with integrity, respecting the different cultures and the dignity and rights of individuals in all countries in which we operate.

The reputation of Arran Isle and the trust and confidence of those with whom it deals are among our most vital assets. The protection of our reputation is of fundamental importance and is every employee's responsibility.

## Specific Principles

### Legal Compliance

Our business methods will always be legal. We are committed to compliance with those laws, regulations and standards which apply to our business activities and any other laws with international reach (e.g. UK Bribery Act) where relevant.

### Business Dealings

We expect all our employees to act with honesty, openness, integrity and courtesy, and expect the same of all those with whom we do business.

We seek to establish productive relationships with suppliers and business partners, conducting our activities professionally with integrity and courtesy, and expect the same from them.

### Commitment to Employees

We respect the rights and dignity of every employee. We are committed to creating a challenging environment of engagement and continuous learning, generating both a common sense of purpose and pride in working for the Group. We have established clear values and objectives, so that all employees understand and are committed to the aims of the Group and see their role within it. We want to realise the potential of employees, recognise individual and team contributions and reward them competitively.

### Equal Opportunities

We recruit and promote employees on the basis of their suitability for the job without discrimination on grounds of race, ethnic origin, religion, political or other opinion, nationality, colour, gender, age, sex, sexual preference, marital status, or disability unrelated to the task at hand. We will not tolerate any sexual, physical or mental harassment of employees.

### Modern Slavery

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Group has a zero tolerance approach to any form of modern slavery. We are determined to have effective systems and controls in place to raise awareness of, and to safeguard against, any form of modern slavery taking place within the Group or, to the best of our ability, anywhere in the Group's supply chain.

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### Child Labour

We do not employ any person below the minimum legal age in any territory in which we operate. We will do our utmost to ensure that all our suppliers comply with this requirement, and will not work with those that flout this law.

### Working Environment

In accordance with the Group’s Health and Safety Policy, we are committed to providing a safe and secure working environment in which all incidents of personal injury and occupational ill health are regarded as preventable. We do not tolerate the use, possession or distribution of illegal drugs, or our people reporting for work under the influence of drugs or alcohol.

We ensure in all our activities and operations, that employees, contractors and visitors are well informed, and given appropriate training and guidance to enable them to carry out their tasks in a safe and competent manner.

### Relationships with Customers

We are driven by the needs of our customers and will provide them with innovative, value-for-money solutions driven by local market needs and supported by our global experience and technology. We want to set the standard for the markets in each country in which we operate, for:

consistent quality  
reliability of service  
continuous innovation.

### Relationships with Communities

We operate as a responsible member of the local communities of which we are a part, exercising a high level of care and sensitivity towards the environment. Each business is required to make some measurable contribution to the local community where we operate. This can take many forms including sponsorship of local clubs or associations, contributions to local charitable causes, provision of resources for community use, or voluntary help by employees.

### Public Communications

We make sure that advertising and other public communications by any of our businesses, is fair, reasonable and ethical. We will comply with the letter and spirit of all statutory regulations on communications as well as best practice guidelines.

### Gifts and Entertainment

Gifts or favours must never be solicited by Arran Isle employees. Gifts of money will never be accepted. Reasonable hospitality and small tokens may be given or accepted provided they are not of significant value, do not place the recipient under any obligation, are not recurring or systematic, are not capable of being misconstrued and could be reciprocated at the same level.

### Bribes and Facilitating Payments

We will not directly or indirectly (i.e. through a third party intermediary or subsidiary) offer, solicit or accept a reward or benefit which seeks to induce a person to do anything improper or illegal.

We will not directly or indirectly pay facilitating payments to any officials in order to expedite the performance of their duties for which they are already bound to perform.

### Misuse of Company Property

Arran Isle’s property and employees’ time are to be used solely for the Group’s legitimate business and not for personal gain. Employees are responsible for the protection of all the Group’s property and for taking reasonable steps to prevent its theft or misuse.

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Conflicts of Interest

Employees must not, without prior written consent, have any direct or indirect interest in any supplier, customer or competitor of Arran Isle which conflicts with the best interests of the Group. Employees are expected to act solely for the benefit of the Group and not be influenced by a personal interest which may result from other individual or business concerns.

Business Information

Employees will only use information received in the course of business dealings for the purpose for which it is intended or normally used and never for personal gain.

Political Contributions

No businesses within Arran Isle make contributions to any political party and they do not provide any form of other support to any political parties.

Whistle Blowing

Employees who know (or have genuine suspicions) of any breaches of this Code of Business Conduct or any legal or regulatory or other violation in relation to work-related issues should report such matters promptly to their manager. We recognise that in certain circumstances it may not be possible or appropriate to do this. In these instances, we encourage employees should use the Arran Isle Whistle Blowing procedures to raise the matter.

Employees will not be blamed for speaking up nor for failure to speak up earlier, and the Group will make all proper efforts to protect the confidentiality of employees who do raise concerns. Any attempt to deter employees from raising concerns will be treated as a serious disciplinary offence.

**Communication and Display of the Arran Isle Code of Business Conduct**

The Code should be communicated to all staff and should be posted prominently in a common, central location at each operating company office.



**Martin Wardhaugh**  
**Chief Executive**  
**January 2018**