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Code of Conduct

Issue 03

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1 Code of Conduct

1.1 Introduction

SyntheSys is a Company that we should all be proud to work for.

This Code of Conduct applies to everyone in the Company. It sets out the principles of ethical business conduct and the standards we should all follow when dealing with fellow employees, customers, suppliers, contractors and competitors, regardless of our location or role.

The Code should be used as a guide to the way you work, whatever you do and wherever you are. It should help you to decide how to act if you are ever in doubt.

This Code should be followed in whichever country we carry out our business. However, we are committed to obeying the laws and regulations of those countries but if any conflicting situation should arise, advice should be sought from a Company Director.

If you become aware of anything which you are not sure about because it seems wrong, or you need advice, please speak up. SyntheSys is committed to creating an environment where people feel comfortable that they can raise issues of concern without fear of retaliation.

1.2 Our Ethical Principles

The five principles of ethical business conduct are:

- Accountability – We are all personally answerable for our conduct and actions;
- Honesty – There is no substitute for the truth;
- Integrity – We say what we will do, we do what we say;
- Openness – When questions are asked, we will be frank and straightforward in our answers;
- Respect – We value each individual and treat them with dignity, respect and thoughtfulness.

The people we do business with will judge us – both as individuals and as a Company – by the way we behave. That is why it is crucial that we apply our principles to whatever we do.

1.3 Company Commitment

The Company commits that its leaders will:

- Act ethically, applying the same high standards of conduct expected throughout the Company;
- Promote ethical conduct both within the Company and in the markets in which we operate;
- Provide training and other resources so that employees are equipped to deal with ethical issues;

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- Listen to concerns that employees have about business conduct and support them in expressing those concerns;
 - Take action when an employee faces retaliation for reporting any suspected misconduct.

2 Workplace Responsibilities

2.1 Workplace Behaviour

SyntheSys employees shall contribute to creating a work environment where individuals are respected and where the values of having a diverse workforce are recognised. Our responsibility is to treat others as we would expect to be treated ourselves and to respect, understand and benefit from the views and opinions of colleagues.

Our aim is to create an environment where the recruitment, employment and development of staff is based on qualifications, skills and competency to do the job.

We must strive to listen to others and value their input, even if their views differ from our own. Humiliating or hostile behaviour will not be tolerated.

2.2 Health and Safety and Environment

We have a responsibility to maintain a healthy and secure workplace and to promote safe working practices. All employees are required to be familiar with the Company Health and Safety Policy and Manual as well as the Environmental Policy and Manual. This information should also be made available to any contractors or agency workers who work for us.

SyntheSys aims to be a carbon-neutral Company. We have a responsibility, both personally and collectively, to use resources efficiently and to ensure that consideration is given to minimising the impact of our operations on the environment. Care shall be taken to minimise any waste, ensuring that we recycle whenever possible.

2.3 Working with Others

We will encourage our suppliers, customers and other business partners to adopt the same high standards of ethical behaviour. We will not engage with suppliers, customers, and other business partners who do not meet acceptable standards of ethical behaviour.

2.4 Bribery, Gifts and Entertainment

SyntheSys adheres to the Bribery Act 2010. Staff will not offer, give or receive any bribes, gifts or inducements for any purpose whether directly or through a third party. Guidance and approval should always be sought from a Company Director before accepting or giving any gift or entertainment. A guide to the Bribery Act 2010 is located in the Document Library of the Company intranet.

2.5 Recording of Time and Costs

All SyntheSys staff will record all transactions, time, expenditure and all other aspects of the Company's business accurately and in accordance with our accounting, expenses and record keeping policies. All time, expenses and other transactions must be recorded in a timely manner.

2.6 Use of Company Information Technology and Physical Assets

Inappropriate use of the Company's Information Technology (IT) facilities can make the security of these systems vulnerable. Unauthorised software must not be installed on a Company IT facility unless permission has been granted by the IT Lead or a Company Director. Company IT facilities must never be used to access inappropriate internet sites.

Telephones and computers may be used for limited personal use providing this does not conflict or interfere with normal business activities.

SyntheSys staff will protect all Company equipment and property in their care from loss, damage, disclosure and misuse. The same responsibility applies to assets belonging to our customers and other third parties.

More information can be found in the Company's Security and Quality Assurance manuals.

2.7 Personal Information

All personal data will be handled appropriately, thus safeguarding individual privacy and following all relevant Company processes and applicable Data Protection laws and regulations. SyntheSys is committed to keeping employees' personal information confidential with access to such details only being gained by personnel with appropriate authorisation.

2.8 Business Information

SyntheSys will protect information that is proprietary to the Company and information in its possession that is proprietary to other parties. The unauthorised use of such information or intellectual property of others – including competitors, customers or suppliers – could be embarrassing, damage our reputation and ultimately put us at risk of legal action. In order to protect this information, we shall:

- Only disclose information on a need to know basis;
- Never share proprietary information from a previous employer;
- Never copy documents and material unless authorised to do so;
- Never destroy documents and material unless authorised to do so.

2.9 Customer Classified Information

SyntheSys will handle Classified and/or protectively marked information in accordance with the appropriate regulations, policies and processes. The Company Security Manual provides clarification.

2.10 Conflicts of Interest

When a conflict of interest arises, it can throw doubt on our integrity and have a damaging effect on our reputation. Conflicts of interest could include, but are not limited to, having a second job or holding financial interests in suppliers or competitors. Potential conflicts of interest must be avoided. In all cases, a conflict must be disclosed to a Company Director as soon as you become aware of it.

3 Business Responsibilities

SyntheSys will ensure that our services and products conform to current Health and Safety legislation requirements.

3.1 Bidding and Contract Negotiation

We will always behave ethically when competing for business. We will:

- Not knowingly make any untruthful or inaccurate statements or communications;
- Disclose information required by law or regulation;
- Not solicit or accept information that we know to be covered by copyright or restricted by law.

3.2 Facilitation Payments

A facilitation payment is a payment or gift given to speed up or perform a procedure. In accordance with the Bribery Act 2010, we will:

- Not make facilitation payments;
- Not allow others to make facilitation payments on our behalf;
- Take action to stop the practice of facilitation payments.

We do, however, recognise that in some countries an employee's welfare and safety could be put at risk if they do not make a facilitation payment. If you find yourself in such a situation, make the payment and report it immediately to a SyntheSys Director.

3.3 Company Giving

We will support, sponsor and contribute to activities of other organisations where the activities are aligned with our own business objectives, values and ethical principles and will enhance the reputation of the Company.

3.4 Political Support

SyntheSys does not participate in political activities or make donations to political parties or their representatives.

3.5 Individual Political Activities and Donations

SyntheSys respects the right of its employees to make personal political donations and to be involved in political activity in their own time. Employees should:

- Not use the Company name, property or equipment to support such activities;
- Always ensure that it is clear that the employees' views and actions are their own and not those of the Company.

3.6 Trade Restrictions and Export Control

SyntheSys will comply with all applicable laws and regulations when importing and exporting products, services and information. If you have any queries regarding export restrictions please, in the first instance, refer to our Company intranet pages for Export Control. If you require further assistance, please seek the advice of the Export Control Lead or the Managing Director.