

1.0 PURPOSE AND SCOPE:

- 1.1** Ethical business practice is one of the guiding principles of Lignacite Ltd. The business is committed to ethical business conduct and expects the highest standards of integrity to be followed by all employees.

Lignacite Ltd is a responsible and accountable business, a good neighbour and committed to doing business in a way that makes our customers choose to do business with us again and again.

- 1.2** This Business Ethics Policy specifies the standard of behaviour the business expects from its employees, and others acting on its behalf, when conducting business on behalf of Lignacite.
- 1.3** This policy is applicable to all employees and to both the Brandon and Nazeing sites.

2.0 POLICY:

- 2.1 BUSINESS ETHICS AND LEGAL COMPLIANCE:** Lignacite requires all employees to conduct business with honesty and integrity. It is the company's policy to comply with this requirement in all aspects of its business, and to ensure compliance by its employees, with all applicable legal and ethical standards.

- 2.2 DUTY TO REPORT NON-COMPLIANCE:** If employees have knowledge of any activities which they have reason to believe may violate this policy, they must report such activities immediately.

Employees are able to raise their concerns with their line managers. Additionally, concerns may be raised with the Operations Director, the Company Secretary or the SHEQ Manager. Further details are outlined in the **Whistle Blowing Procedure**.

- 2.3 CONFLICTS OF INTEREST:** The integrity of all employees must be capable of scrutiny at all times. While the company respects the right of employees to privacy in their personal activities and financial affairs, employees must not have personal interests which conflict, or could conflict, with those of the business or bring the reputation of the business into disrepute.

- 2.4 GIFTS AND HOSPITALITY:** All gifts and hospitality given or received by an employee must comply with the **Gifts and Hospitality Policy**.

- 2.5 IMPROPER PAYMENTS:** No employee may offer, pay, promise or authorise the payment of money or anything of value to any other person where it is believed that the money or thing of value will be improperly given or promised in order to obtain, retain, facilitate or expedite business for the company.

No payments may be made for the purpose of improperly influencing the action or decision of the recipient, inducing the recipient to do or refrain from doing any act in breach of his or her lawful duty, or inducing the recipient to exert influence on any foreign government or its department or agency. The company has a zero-tolerance policy to bribery and corruption.

- 2.6 COMPLIANCE WITH LAWS PROHIBITING ANTI-COMPETITIVE ACTIVITY:** The business complies with all aspects of competition law. The business is committed to ensuring no anti-competitive contact takes place. Potentially anticompetitive contact is reported.

- 2.7 POLITICAL CONTRIBUTIONS AND ACTIVITIES:** The company makes no political contributions and is not affiliated to any political party or organisation.

Category: Core		Type: Policy		Reference: 1.08
Page 1 of 4	Issue Date: 12/02/2025	Issue No.: 005	Author: Marvyn Candler	

2.8 SUPPLIER RELATIONS: Our relationships with the people and organisations that supply goods or services to the company are of paramount importance.

Suppliers are selected impartially, on the basis of price, quality, performance and suitability of product or services.

To support fair competition in the sourcing of suppliers, the business will:

- Monitor and document key decisions to ensure high standards are maintained in how we conduct our business.
- Suppliers will be treated fairly, negotiating terms and conditions and payment terms without bias.
- Strive to use local sourcing and local business where both practical and appropriate.

2.9 HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION: Employees are responsible for conducting the company's business in a manner that protects the health and safety of employees, as well as the environment.

They should act at all times in a manner that ensures the company complies with all applicable health, safety and environmental requirements. Please refer to the Health and Safety, and Environmental Policies.

2.10 EQUALITY, DIVERSITY AND INCLUSION: The company values the diversity provided by gender, race, colour, ethnic or national origin, sexual orientation, religion, or marital status. The principles and practices of equal employment opportunity and workforce diversity contribute to the achievement of the company's business objectives. Please refer to the **Equality and Diversity Policy**.

The company expects its employees to maintain a workplace that is free from any form of discrimination, harassment or bullying.

The company is committed to ensuring people are treated with respect and raise awareness and sensitivity to issues around equality and dignity at work.

The company will promote its values of Customer Care, Integrity and Quality and ensure we have high standards and expectations around leadership, team management and general conduct.

2.11 HUMAN RIGHTS: The company's business activities are pursued with respect for human rights. As such, it needs to ensure and to demonstrate that it treats all employees and contractors fairly, legally, with respect and with dignity. The company endeavours to operate in a manner consistent with the principles of the United Nations Universal Declaration of Human Rights and the core International Labour Organisation Convention areas (freedom of association, collective bargaining, non-discrimination, prohibition of child labour and of forced labour).

We will not participate in, contribute to or obtain information from any blacklist or other similar service which undermines these principles and as part of this obligation we will ensure that compliance with our Equality and Diversity Policy, as well as this Business Ethics Policy, will form part of the selection process for appointing subcontractors and other members of our supply chain.

2.12 CONFIDENTIALITY: During the course of employment, employees may acquire information not generally known to the public, including knowledge of a commercially sensitive nature,

Category: Core		Type: Policy		Reference: 1.08
Page 2 of 4	Issue Date: 12/02/2025	Issue No.: 005	Author: Marvyn Candler	

business plans or outlook, marketing or sales programmes, significant new services or price changes, mergers and acquisitions, offering or redemption of shares, changes in management and other proprietary and confidential information. Employees must not disclose, during or after their employment by the company, any non-public information regarding the company's business or operations to any outsider unless disclosure is authorised in writing by Senior Management.

Whenever possible, authorised third party recipients of the company's confidential information should be required in advance to execute agreements acknowledging their confidentiality obligations to the company.

The terms and conditions of employment for all employees make it clear that all information which becomes available as a direct result of their employment is confidential to the company and should not be disclosed except as required in order to achieve the company's business objectives.

The company undertakes to protect the personal data of all persons with whom it holds a record in accordance with the Data Protection Act 1998 and the GDPR regulations.

2.13 COMMUNICATIONS – EXTERNAL AGENCIES: From time to time the company may be obligated to permit government and other external agents to review its policies and practices. It is the company's policy to ensure that such inquiries are properly handled to minimise the company's exposure and liability.

In the event that copies of specific company procedures or practices are requested by representatives of such agencies or interviews with Lignacite staff are requested, such requests should be handled in a manner consistent with such procedures or practices.

When engaging with representatives from such agencies, employees **MUST**:

- Ensure that views put forward are fair, true and accurate and free from any personal bias
- Not bring the Company into disrepute;
- Comply with the wider requirements of this Business Ethics Policy to report any conflicts of interest and to act with honesty and integrity.

2.14 COMMUNICATIONS – NEWS MEDIA: It is important that inquiries from the news media are properly handled in order to maintain effective public relations and to protect the company's competitive position and propriety information.

Employees must not discuss company business with any member of the news media, even on an informal basis. This will minimise news stories based on rumour or unofficial "tips" which can be damaging to the company's best interest.

All requests for information from the news media must be referred to the Operations Director.

2.15 COMMUNICATIONS – EMAIL, INTERNET AND SOCIAL MEDIA: Company email and internet systems are for business use only. All employees have a responsibility to use these systems appropriately and in a professional manner.

Manages have a responsibility on a day to day basis for ensuring that access to the business systems is used prudently. Managers must ensure that staff are informed and familiar with these policies and that they agree to be bound by the terms listed. Key issues with regard to the use of these IT facilities are:

Category: Core		Type: Policy		Reference: 1.08
Page 3 of 4	Issue Date: 12/02/2025	Issue No.: 005	Author: Marvyn Candler	

- Misuse of email, internet or social media for personal communications;
- Risk of defamation by an individual or organisation;
- Bringing into the workplace via email, the internet or social media material of a racist, pornographic, sexist, obscene, abusive, defamatory or other inappropriate nature or material that may be in breach of copyright;
- Unwittingly creating a binding contract with a supplier, client, etc.;
- Knowingly introducing a virus to company equipment or forwarding a virus.

The company reserves the right to monitor employee's social media accounts to ensure the accounts are not being used to post comments which could be considered derogatory to the business or bring the reputation of the business into disrepute.

3.0 ASSOCIATED DOCUMENTATION:

3.1 This policy is supported by additional policies and procedures found in the company management systems, as well as the Company Employee . Documents which are affiliated to this procedure include:

- Anti-bullying, harassment and victimisation policy
- Customer complaints procedure
- Data Protection Policy
- Disabled workers procedure
- Employment and skills policy
- Environmental policy statement
- Health and safety policy statement
- Induction procedure
- Information Security Policy
- Local communities policy
- Management of contractors procedure
- Menopause policy
- Mental health and well-being policy
- Occupational health procedure
- Quality policy statement
- Recruitment policy
- Resource use policy
- Responsible sourcing policy
- Training and competence procedure
- Vendor assessment procedure
- Whistle blowing procedure

Signed:..... *G. de Lotbiniere*
GAJ de Lotbiniere, Chairman

Date:..... 28/4/25

Category: Core		Type: Policy		Reference: 1.08
Page 4 of 4	Issue Date: 12/02/2025	Issue No.: 005	Author: Marvyn Candler	