

Senior pic

Code of Conduct

senior

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1. INTRODUCTION

1.1 Message from Group Chief Executive Officer

It is my unshakeable belief that **how** you do business is every bit as important as **what** you do in business.

The Senior plc Group has a clearly defined vision to be a trusted and collaborative high value-added engineering and manufacturing company producing sustainable growth in operating profit, cash flow and shareholder value. In working towards this vision, it is vital that Senior maintains an absolute commitment to the highest standard of ethics and a zero tolerance towards bribery and corruption. We will operate in a culture where the values of operating with integrity and in a respectful and ethical manner sit shoulder to shoulder with our focus on the customer and our passion for excellence and guide our people in the judgments, actions and decisions they make every day.

This April 2018 version of the Senior Code of Conduct (the Code) provides us all with a clear framework on which to base decisions as we go about our day to day business. It does this by:

- Clearly setting out the behavior we expect of all employees
- Providing guidelines which help us apply our values
- Enabling you to raise a concern or ask a question if you are in doubt.

We must all take personal responsibility for behaving in an ethical way and for our own actions. I encourage you to read the Code carefully and refer to it regularly. You will be required to confirm, on a regular basis, that you have complied with the Code. The good reputation of Senior has been built up over many years. Any breach of the Code could affect our reputation, would let down our investors, our customers and our fellow colleagues.

Each of us is responsible for our own actions and it is your duty to challenge and report any behavior that is inconsistent with this Code. The Code sets out how to do this. You have my commitment that any threat or retaliation against someone reporting unethical or illegal conduct, in good faith, will not be tolerated. There may be disciplinary consequences for those who breach the Code, potentially including dismissal.

I am personally committed to the Code and I expect the standards set out in it to be maintained by all involved in our organization. Please give the Code your full attention and if you have any questions or if anything is unclear then please don't hesitate to ask your business leader.

David Squires

Group Chief Executive Officer

April 2018

1.2 What is a Code of Conduct?

Senior plc is committed to maintaining the highest standards of ethics and integrity in the conduct of its business throughout the world. In doing so, it seeks to take account of all of its stakeholders, including shareholders, employees, customers, suppliers, governments, regulatory bodies and the environment.

The highest standards of ethical behavior, and compliance with all applicable laws and regulations are key to protecting the reputation and long term success of our business.

The Senior plc Code of Conduct (“the Code”) helps us to achieve these high standards of ethical behavior by setting out the principles and guidance that underpin the way we conduct business across the Group.

The Code seeks to:

- Clarify the behavior we expect of all employees
- Provide guidelines which help you apply our values
- Enable you to raise a concern or ask a question if you are in doubt

1.3 Who does it apply to?

The Code applies to Senior plc, all of its subsidiary operations and associated entities (the “Group”). All employees of the Group are required to follow the principles in the Code when performing their day-to-day duties or where they are representing Senior. This issue of the Code supersedes all previous versions. You must ensure that you read it and seek clarification if any area is unclear.

Employees, agents and other parties acting on behalf of the Group and associated entities are required to conduct the Group’s business in accordance with:

- The laws of the country in which the relevant Group operation is located;
- The laws of the country and other jurisdictions in which that business is being transacted;
- The Code.

We all take personal responsibility for behaving in an ethical way and for our own actions. It is not justifiable or excusable to behave contrary to the Code or any relevant law or regulation because we were told to do so by someone in higher authority.

Senior plc is also committed to only work with third parties who conduct their business in a way that is consistent with the Code.

Anyone in the business who is responsible for others as a leader, manager or supervisor has additional responsibilities. You must:

- Ensure that employees know where to find the Code and have read it
- Provide guidance to employees to help them achieve the standards of the Code
- Be a role model, promoting the standards of the Code in your day-to-day activities
- Help to monitor how the Code is being applied
- Ensure that you support anyone who raises an ethical concern or question
- Ensure that third parties are aware of the Code and follow its principles

Failure to observe the requirements and spirit of the Code will, in the case of employees, result in disciplinary action which in serious cases could lead to the termination of

employment and, in the case of agents, may result in the termination of their appointment. Disciplinary action may also result where an employee has condoned unethical behavior, failed to report it, not taken reasonable measures to prevent it or retaliated against someone who has raised concerns in good faith.

1.4 Senior plc Vision and Values

Our Group Vision

Our vision is to be a trusted and collaborative high value-added engineering and manufacturing company producing sustainable growth in operating profit, cash flow and shareholder value.

Our Values

Senior's values underpin all we do:

Safety: We operate safely, protecting people and the environment

Integrity: We operate with integrity and in an ethical manner

Customer Focus: We put the customer at the heart of everything we do

Respect and Trust: We work together with mutual respect and trust

Accountability: We do what we say

Excellence: We continually strive to do better in every aspect of our business

1.5 How to raise a Concern or ask a Question

We hope that the Code and the underlying Group Policies, which can be found on the Senior plc Intranet, will enable you to take appropriate decisions in most cases. However, some situations do not have an obvious right answer. It can be helpful to consider your response to several questions when deciding on the appropriate course of action:

- Is this action legal, fair and honest?
- Does it comply with the Code?
- Am I setting a good example?
- How will I feel about it afterwards?
- How would this look if reported in the media?
- Could I explain my actions in a court of law?

The fact that 'it's what everyone else does', is what 'needs to be done to get the job done' or that 'no one will ever know' does not make it right or acceptable.

If you are still in doubt, you should, in the first instance, seek advice from one of the following:

- Senior Connecticut Purchasing Manager

You may also report a concern in relation to the Code using the Group's Whistle-Blowing Policy which can be found on the Intranet and on workplace noticeboards.

1.6 Certification and Training in the Code of Conduct

On receipt of this version of the Code all employees must sign that they have received and read the Code. There is an annual re-certification process for all employees to confirm compliance with the Code.

Senior plc has an on-line ethics training program which all relevant employees are required to complete on joining the business. There is also refresher training on a minimum of an annual basis. You will be sent details of any training you must complete with a deadline. Completion of allocated training is mandatory.

2 OUR BUSINESS RELATIONSHIPS

2.1 Conflicts of interest

Principle

We avoid any relationship, influence or activity that may impair our ability to make fair and objective decisions when performing our jobs. Conflicts of interest arise if we or members of our families have personal business commitments, financial interests or other jobs which do or might conflict with Senior's business and we find ourselves compromised.

We may not perform any outside work as an employee, director, consultant or other relationship where this may interfere with our ability to perform the duties for which we are contracted to Senior or which diverts business away from Senior.

We comply with applicable laws and regulations in relation to the employment or engagement of current or former military and government personnel.

What does this mean?

You must:

- be alert to any situation which may, or may appear to, conflict with the interests of Senior.
- make sure that any actual or potential conflict of interest is disclosed, monitored and recorded.

You must never:

- do business on behalf of the Group with companies, or other organizations, in which you, your family or personal friends, have a significant financial or other business interest, unless you have obtained the prior written approval of the CEO or General Manager to whom you report.
- accept any employment or other commitment to a competitor or potential competitor to Senior, who is under contract with Senior.
- take on any employment or other commitment which may prevent you from performing the duties for which you are contracted to Senior.
- take advantage of your knowledge, contacts or position within Senior for personal gain or to benefit a family member either directly or indirectly.

Q&As

Q My wife works for a company that is tendering to supply Senior with components. I am involved in evaluating the tender responses. What should I do?

A This could be a conflict of interest depending on the role your wife has in the company. You should speak with your Manager to seek guidance.

Q My neighbor has asked me to see if there is an opening for his son, who has recently graduated from university, and whether I can 'pull any strings'.

- A You should advise them to apply to the relevant department. You should avoid playing any part in the recruitment process which could be seen as a conflict of interest.

Applicable Group Policies

Whistle-Blowing Policy

2.2 Insider Dealing

Principle

We keep all inside information confidential within Senior and use it only as necessary to perform our role. We do not engage in, encourage, or facilitate insider dealing. We will not use any non-public information about our business or other companies for buying or selling shares, other securities or financial instruments for our own benefit or enable anyone else to use it.

What does this mean?

You must not buy or sell shares in Senior plc while in possession of price sensitive information. Senior plc's shares are quoted on the London Stock Exchange. It is against the law and a criminal offense to deal in shares of the Company while in receipt of inside information whether you or others do it and if you do so for your benefit or someone else's benefit. Inside information is information which is precise in nature, is not generally available and, if it were, is likely to have an impact on the share price.

You must comply with any share dealing restrictions that may be imposed by the Group from time to time. If you are in any doubt whether you may trade in Senior's shares, you should contact the Company Secretary before trading. Certain directors and employees who act in a managerial capacity have stricter rules placed on them.

Q&As

Q I am involved in due diligence on a potential acquisition. I believe that the share price will increase when the acquisition becomes public. Can I, or my spouse, buy shares in Senior plc?

A No. You would be trading while in receipt of inside information and this is illegal. This applies to you and any family member.

Applicable Group Policies

Procedure for Dealing in the Company's Shares

Whistle-Blowing Policy

2.3 Anti-Bribery and Corruption

Principle

Senior has a zero tolerance policy for bribery and corruption. We do not offer, pay, solicit or accept bribes, kickbacks, facilitation payments, or other advantage in any form, either directly or indirectly. We will not participate in any kind of corrupt activity directly or through third parties. In particular, subcontracts, purchase orders or agency or consultancy agreements must not be used as a means of channeling payments to any third party.

We will understand and follow all the applicable bribery and corruption laws that apply in the countries where we do business, including the US Foreign Corrupt Practices Act.

Code of Conduct

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We will take great care in selecting business partners and agents to ensure that they meet our standards at all times.

What does this mean?

You must not give, receive, ask for or permit anyone else to give bribes or enter into corrupt activity in order to win new business, retain existing business or otherwise further the business interests of Senior.

You must immediately report any offer of or request for a bribe to the Group Company Secretary, including the request for a facilitation payment.

Bribery is the offering, provision or receiving of something of value including cash, gifts, kickbacks and entertainment to persuade or reward someone for doing something improper.

Corrupt activity includes bribery, extortion, fraud, deception, collusion and money laundering.

You must not make a facilitation payment except where there is a real and credible threat to your personal safety. A facilitation payment is an unofficial payment to a government official to expedite or secure the performance of a routine action. Examples include obtaining visas or obtaining customs clearance.

All agents and other intermediaries acting on behalf of Senior must be pre-approved in accordance with Senior's Agents policy.

You must ensure that any charitable donation or sponsorship is properly approved as per local policy.

You must not use company funds, directly or indirectly, to make contributions to political parties, or organizations or candidates for public office.

Q&As

Q I am currently involved in a re-tendering process for our restaurant facilities. One of the bidding suppliers has offered me a ticket to the Football Cup Final. My favorite team is playing and the tickets have been sold out for ages. Can I accept the ticket?

A No. You are in a re-tendering process and you must not allow yourself to be unduly influenced, or give the impression of undue influence. You should politely decline the ticket and report the matter to your Manager.

Q We are competing for a new contract. The potential customer has said that we will win the contract if we offer a sub-contract element to his brother's business. Is this acceptable?

A No. This is not an ethical way of doing business. You should report the incident to your Manager.

Applicable Group Policies

Agents Policy

Gifts and Hospitality Policy

Whistle-Blowing Policy

2.4 Gifts and Hospitality

Principle

Gifts and hospitality will only be given or received if they are reasonable. They should be for business purposes, infrequent, proportionate and not material. We never accept or offer gifts or hospitality where they could, or may appear to, influence a business decision.

Such hospitality or expenditure should be reasonable and proportionate, must not exceed reasonable local practices, must be permissible under all applicable laws and must not knowingly breach any internal policies which apply to the giver or receiver.

What does this mean?

You must only give or receive gifts or hospitality for business if they are reasonable. i.e. reasonable, proportionate and not frequent.

You must not offer or receive a gift of money.

You must not provide hospitality or incur promotional expenditure for the benefit of a public official without prior written management approval.

You must not make or offer any gifts or hospitality, provide sponsorship or a charitable donation which could, or could appear to, affect the independence of others.

You must not receive or request any gift, hospitality, kickback, sponsorship or charitable donation which could, or could appear to, affect your independence in the making of a business decision.

You must immediately report any gift or hospitality offered or requested which is inappropriate to your Supervisor/Manager.

You must record the details of all gifts and hospitality given or received in a personal register. The register must be declared where any gift or hospitality provided or received has an individual or annual aggregate in excess of £200, (or lower amount as specified in the Gifts and Hospitality Policy), in the site register.

Q&As

Q I have been given an expensive gift during a business meeting and know that, due to cultural traditions, it would offend the provider if I did not accept it. What should I do with the gift, so as not to offend the provider?

A You should report the gift immediately and ask for guidance. When it is not appropriate to accept or retain the gift the Company may ask you to return the gift or seek the provider's permission to donate it to charity.

Applicable Group Policies

Gifts and Hospitality Policy

Whistle-Blowing Policy

2.5 Representatives and Intermediaries acting for us

Principle

All representatives, including agents, distributors and other third parties appointed by Senior to act for us will be chosen and monitored carefully. All representatives must sign up to and comply with the Code as well as all applicable laws and regulations.

Agents, distributors and other business partners will only be appointed if there is a valid business case and following prior management approval.

What does this mean?

You must not commence business discussions with any representative or other intermediary before they have been approved.

You must ensure that all representatives and intermediaries sign up to this Code and do not behave in a way that will damage the reputation of Senior.

Q&As

Q A potential agent has approached me with a new opportunity in a new territory. Tenders need to be submitted very quickly. There is not time to perform full due diligence on the agent before the tender needs to be submitted. Can I go ahead and appoint the agent?

A No. It is of utmost importance that we deal only with agents who have successfully completed the due diligence process and signed up to our agreement and the Code. You should explain this to the agent and work internally to expedite the approval process.

Applicable Group Policies

Agents Policy

Gifts and Hospitality Policy

Whistle-Blowing Policy

2.6 Working with our Customers, Suppliers and Partners

Principle

Senior treats its customers and suppliers with fairness and integrity. We do not seek to gain unfair advantage through the use of any unfair dealing practice.

We respect the confidentiality of commercially sensitive information provided to us and we only use it for legitimate business purposes.

We conduct due diligence on new customers and suppliers. We select those that have the same commitment to ethical business conduct as ourselves.

What does this mean?

You must respect the confidential information of our customers, suppliers and partners using it only for the purpose for which it was provided.

You must treat all of our customers and suppliers with fairness and integrity regardless of length of relationship or contract value.

You must never sign off or ship product which you know to be faulty or sub-standard.

Due diligence must be performed on new suppliers and customers to ensure that they operate to the same high standards of quality and integrity as Senior plc and have a Code of Conduct.

Q&As

Q We are under pressure to achieve our year end revenue target. I have a shipment to make which has some surface damage, which would normally be corrected prior to shipment. Can I go ahead and ship the product?

A No. You must only ship good product no matter that the target may be missed.

Applicable Group Policies

Contract Review Policy

Responsible Sourcing Policy

Gifts and Hospitality Policy

Whistle-Blowing Policy

2.7 International Trade Compliance

Principle

Senior will conduct its business in full accordance with all legal requirements and relevant sanctions for the import and export of goods and services in the countries within which we operate.

What does this mean?

You must comply with all import and export laws and regulations when transferring goods, services and/or technology within your country and across international boundaries, taking advice as necessary.

You must obtain all necessary import and export licenses.

You must comply with national and international sanctions and embargoes and Senior's country specific guidance when doing business with companies in other countries.

You must not travel with a laptop or other electronic device containing controlled technology without the appropriate authorization from your CFO or export compliance officer.

Q&As

Q We have signed a contract for which we require an export license. We have not yet applied for the license but believe that there is plenty of time to obtain it. Is this okay?

A You must check with your CFO, or other qualified officer, that a license can be obtained before entering into the contract.

Applicable Group Policies

Local Export Compliance Program Manual

Whistle-Blowing Policy

2.8 Competition and Anti-Trust Law

Principle

We conduct business in an honest and straightforward way.

We comply with competition and anti-trust laws in the countries where we operate. We will not enter into discussions or agreements, formal or informal, with competitors which undermine fair competition.

What does this mean?

You must not enter into any conversations, meetings, email exchanges or other communications with competitors that might be or might seem to be anti-competitive, including pricing, production, customers or markets.

You must respect the confidential information and intellectual property rights of our competitors and other third parties.

You must report any suspicions of anti-competitive behavior to your Supervisor/Manager or local CFO.

You must use legitimate means to obtain competitive information.

You must take care before you agree any restrictions with competitors, joint venture partners or other third parties as to who they can sell to or buy from and on what terms.

Q&As

- Q Another company has asked to discuss what contract terms and pricing we have negotiated with a supplier, as they would like the same kind of deal that we have. Is this okay?
- A No. First, we have an ethical and contractual obligation to respect the confidentiality of the supplier's pricing. Secondly, our actions might be construed as an attempt to fix prices in the supply market.

Applicable Group Policies

Whistle-Blowing Policy

3 OUR WORKING RELATIONSHIPS

3.1 Equality, Diversity and Inclusion

Principle

We treat everyone fairly, equally and value diversity.

We will not make employment decisions on the basis of anything that does not have a direct bearing on the ability of the individual to perform the job.

We value diversity and promote equal opportunities for all employees in a workplace free from discrimination.

We are open, honest and courteous in our working relationships.

We value individual differences and believe that active inclusion of all strengthens Senior.

What does this mean?

You must treat everyone you meet in the course of business with respect, fairness and dignity.

You must speak up if you observe behavior which you believe contravenes the principles of equality, diversity and/or inclusion.

If you are a manager, you must make recruitment, selection and development decisions on objective criteria, including skills, qualifications and experience.

Q&As

Q My colleague is recruiting a new member for the team. However, I am concerned that he may be excluding applicants for reasons that are unfair and not relevant to the requirements of the job. Should I challenge the selection criteria he is using?

A It is unfair to discriminate, on any grounds, in resourcing decisions. Including criteria that are not directly relevant to the job can unintentionally exclude certain groups of people. A diverse team with a mix of skills and experience is likely to be more effective. You should raise your concern with Human Resources.

Applicable Group Policies

Whistle-Blowing Policy

Diversity and Inclusion Statement

Local Human Resources Policy and Handbook

3.2 Discrimination, Harassment and Bullying

Principle

We do not tolerate any form of discrimination, harassment or bullying against any of our employees or others we work with and treat each other with mutual respect.

This includes, but is not limited to, demeaning, insulting, embarrassing, sexual or intimidating behavior directed to any employee or others we work with related to gender, race, ethnicity, sexual orientation, physical or mental disability, age, pregnancy, religion, veteran status, national origin or any other legally protected status.

What does this mean?

You must not act in a way which is inappropriate or unacceptable or that causes offense to others or could bring the Company into disrepute.

You must not tolerate discrimination, harassment or bullying against yourself.

You must speak out against discrimination, harassment or bullying where you observe it.

Q&As

Q Some of my colleagues make comments about my sexual orientation. If I ask them to stop they say they are only joking. Should I just ignore it?

A No. You should speak to your Manager or Human Resources. All allegations will be taken seriously and appropriate action will be taken. If you prefer, you can raise your concern under the Whistle-Blowing Policy.

Applicable Group Policies

Whistle-Blowing Policy

Local Human Resources Policy and Handbook

3.3 Human Rights

Principle

We respect the Human Rights of all those working for or with us. We will not exploit anyone, wherever in the world we are working. We will not do business with companies, organizations or individuals who we believe do not work to the same standards as ourselves.

We will take steps to ensure that our supply chain is free from Modern Slavery.

What does this mean?

You must not employ child labor directly or indirectly.

You must not work with any company, organization or individual who does not uphold our Human Rights principles. This includes ensuring that our suppliers do not engage in Modern Slavery.

You must comply with the law on working hours and wages in the countries in which we operate.

You must make the health, safety and wellbeing of employees and others a top priority.

3.4 Health, Safety and Environment

Principle

We seek to create a safe and healthy work environment, free from accidents, work-related ill health and environmental incidents. The Group is committed to maintaining the highest practicable standards of health, safety and environmental (HS&E) management and to continuously seek to improve these standards to international best practice levels.

We expect everyone who works in our business to help achieve these Health, Safety and Environment goals.

What does this mean?

You must take personal responsibility for HS&E in line with your function, level of authority and qualifications.

You must demonstrate the essential behaviors of HS&E.

You must immediately raise any HS&E concerns with your Supervisor/Manager or local HSE Manager.

You must support the Group's efforts to minimize any potential impact on the environment by developing new and better processes and services, the efficient use of energy and resources, minimization of environmental impact and waste generation, and safe and responsible disposal of residual wastes.

Q&As

Q My Manager does not wear the correct safety equipment when he visits my area. What should I do?

A You should raise the matter with your Manager. If he does not change his behavior, or you feel uncomfortable speaking with him, you should raise it with your local Health, Safety and Environment Manager.

Q I am under a lot of pressure at work to fulfill a contract by a specific date. I am working long hours and it is adversely impacting on my home life. Where can I get help?

A You should discuss your concerns with your Manager or with your local Human Resources Manager.

Applicable Group policies

Health, Safety and Environment Policy

Whistle Blowing Policy

3.5 Working with our Communities

Principle

The Senior plc Group operates in 14 countries across the world. We respect the communities within which we operate and strive to make a positive impact by running our operations responsibly and investing in local initiatives as appropriate.

We encourage community investment activities and charitable giving which help us to recruit, retain and develop our people while demonstrating good corporate citizenship.

We do not make political donations or contributions.

What does this mean?

You must not deliberately or knowingly ignore or show lack of respect to local customs.

You must ensure that charitable giving, sponsorship and community investment whether in cash or in kind is pre-approved by your site CFO and recorded in the charitable giving register.

You must not use company funds to make any political donation or contribution.

Applicable Group policies

Gifts and Hospitality Register

4 INTEGRITY IN THE WORKPLACE

4.1 Personal and Confidential Information

Principle

We safeguard confidential and trade information belonging to the Group.

We treat information safely that is disclosed to us under obligation or implied obligation of confidentiality. This includes employee information, financial information, strategies or plans which are not in the public domain, product, technical, customer information and intellectual property.

Senior has ensured and continues to work on making sure that our processing of personal data is lawful, fair and transparent to data subjects. We ensure that personal data is secure and consistent with other requirements of the General Data Protection Regulations (GDPR) and other legislation.

What does this mean?

You must only keep personal information for specified, explicit and legitimate purposes and it must be retained for no longer than is necessary.

You must never discuss personal or confidential information where you can be overheard.

You must not leave personal or confidential information (including customer information) in a public or insecure place.

You must only disclose and exchange personal and confidential information in accordance with all relevant policies and local laws and regulations for legitimate business reasons and with an established business relationship and/or a Non-Disclosure agreement in place.

You must only transfer personal data to a third country or party as permitted by local laws and regulations and in line with the General Data Protection Regulations (GDPR) where personal data related to any EU citizen is involved.

If you are in doubt you must seek advice before handling personal or confidential information.

You must inform your Supervisor/Manager if you have concerns about how personal or confidential information is secured, processed or shared in your part of the business.

Q&As

- Q I have received a drawing and some technical data from a supplier whose product we are considering for one of our contracts. Can I send this information to another supplier to see if they have a similar product or can develop one?
- A No. You cannot share the data with the other supplier. It was provided to us in confidence and the purpose has been clearly indicated.
- Q I have received a call from a bank requesting confirmation of an employee's salary to support a loan application. Can I pass this information to the bank?
- A You can only pass the information to the bank with the written permission of the employee.

Applicable Group Policies

Data Protection Policy

Local export compliance program manual

Local IT Policy

Whistle-Blowing Policy

4.2 Use of Company Systems, Property and Assets

Principle

We take personal responsibility for the proper use of our business property, including materials, facilities, equipment and IT systems. We take similar care with the assets of our customers and other third parties.

Our technologies, intellectual property and commercially sensitive information are vital assets to the business and we protect them from unauthorized use and disclosure.

We do not use Group IT systems to access, store, copy or transmit any information or data considered to be offensive, obscene or inappropriate.

What does this mean?

You must use Company assets and resources only for legitimate business activities, unless otherwise permitted by Company policy.

You must ensure that Company property is secure when not in use.

You must take care to ensure that intellectual property, confidential or commercially sensitive information is not disclosed other than in an approved manner for legitimate business reasons.

You must use Company IT systems in accordance with the IT Policy and never to access, store, copy or transmit any information or data considered to be offensive, obscene or inappropriate.

Q&As

- Q I am staying in a hotel as part of a business trip. Can I connect my laptop or other Company device to the hotel Wi-Fi so I can surf the internet?
- A Yes. The first thing you need to do after connecting to the hotel Wi-Fi is to log on to the Company's remote access service or virtual private network ("VPN") before you

visit any other internet sites. By connecting to the Company remote access service or VPN before surfing the internet, you will be providing the maximum level of protection to your laptop or other Company device and the data stored on it.

Applicable Group Policies

Information Security Policy

Local IT Policy

4.3 Accuracy and Integrity in Business Records

Principle

We maintain accurate and complete financial and other business records, complying with legal and accounting requirements.

We prepare financial statements in a timely manner representing the facts accurately and completely.

We require relevant employees to record their time accurately.

We maintain a rigorous system of financial, operational and compliance controls and an effective system of risk management.

We seek to prevent and detect fraud through our system of internal controls and internal and external audit.

What does this mean?

You must not deliberately provide false or misleading data or incorrect financial information to others.

Where required, you must accurately record your time allocation across contract, projects and other business activities.

You must accurately record and report business expenses in a timely manner and in line with Company policy.

You must follow the Group Accounting Manual and work in accordance with published Delegated Authorities.

You must be alert to possible fraud in its widest sense and promptly report any concerns to your Supervisor/Manager.

Q&As

Q The job I am working on has taken longer than expected. My Manager has asked me to book some of my hours to an indirect code to ensure the contract does not go over budget. Is this okay?

A No. You would be artificially manipulating results, which is wrong. You may also be contravening local laws. It is important that accurate records of the actual costs of fulfilling job cards are maintained. You must report the request to your local Human Resources Manager.

Applicable Group Policies

Group Accounting Manual

Delegated Authorities Matrix

Local Expenses Policy

Whistle-Blowing Policy

Contract Review Policy

4.4 Observing Quality Requirements

Principle

It is of upmost importance that we deliver product that is of the highest quality and conforms with customer requirements, approved processes and our quality management system.

Failure to observe all applicable product requirements, including but not limited to, drawings, material specifications, agreed processes and inspection routines may result in product which is non-compliant leaving one of our sites. This can have far reaching consequences for Senior and our customer.

What does this mean?

You must follow all product requirements including drawings, material specifications, approved processes, tolerances and inspection requirements.

You must never allow product to ship which has not been manufactured and tested in accordance with all quality requirements. It is recognized that quality escapes do happen from time to time and we have processes in our quality systems to deal with such events. However, knowingly deviating from quality requirements or knowingly allowing sub-standard product to be shipped is an ethical issue as it may cause harm to the Company, to our customers or even raise safety concerns.

You must report any quality concern that is not being dealt with in the proper way as soon as you observe it. In the first instance this should be to your Quality Manager, supervisor, HR Manager or, if you still have concerns, through the Whistle Blowing Policy.

You must ensure that any proposed change to specification or process obtains appropriate customer approval prior to implementation.

Q&As

- Q One of our machines is down for unplanned maintenance. Can I move product to another machine so that I can ship it on time?
- A You must check whether customer approval is required prior to any process change for this part is implemented.

Applicable Group Policies

Whistle Blowing Policy