

CODE OF CONDUCT

PURPOSE

Engenda Group’s Code of Conduct sets out the expectations of standards of behaviour from all who work with us. The Purpose of the Code of Conduct is to educate our team in preventing ethical ambiguity, detecting conflicts of interests and reporting actual or potential violations of the Code of Conduct.

As we cannot predict every possible situation that might arise, the Code of Conduct serves as a guide to assist in making decisions. The Code of Conduct works in conjunction with Engenda Group Policies and Procedures to create an ethical working environment.

The Code of Conduct applies to all members of the Board of Directors and all Engenda Group employees. Our suppliers and partners are expected to respect the Code of Conduct in all dealings with Engenda Group. As Engenda Group operates in many countries around the world, Engenda Group and its employees must obey the law in each jurisdiction we work within. In cases where there is contradiction between the Code of Conduct and a local law, employees must seek guidance from their Senior Management Team.

MISSION AND CORE VALUES

Engenda Group Mission:

"To be the market leader in the provision of essential, value adding engineering services"



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UPHOLDING THE CODE OF CONDUCT

The Code of Conduct has been written by the Board of Directors and each member is fully committed to upholding the standards set out within it. The Board of Directors have set in place an internal audit, risk assessment and monitoring process to test the effectiveness of the Code of Conduct. The standards expected of all team members are clearly set out and apply at all Engenda Group locations, even if superior to local legislative requirements. Training and adequate communication will be given to all employees.

Expectations of Management

Managers within Engenda Group are expected to:

- Know the Code of Conduct in detail and actively promote it in the workplace
- Lead by example, providing a model of high standards and creating an appropriate work environment
- Be vigilant in detecting, preventing and responding to violations of the Code of Conduct
- Assist with senior management in the investigation and closing out of violations
- Protecting team members who report violations from retaliation
- Involving the appropriate authorities, if necessary, at the appropriate time

Expectations of all employees and workers:

Employees are expected to be the custodians of Engenda Group’s reputation. Every employee is expected to comply with the Code of Conduct, policies and procedures, applicable laws and industry standards. Employees within Engenda Group are expected to:

- Understand the Code of Conduct and how it applies to your job role
- Take full responsibility for acting within the guidelines of the Code of Conduct
- Always make decisions with the Code of Conduct in mind
- Always act in good faith, reporting concerns to the appropriate person as soon as possible
- Participate with honesty and integrity in Code of Conduct investigations

Expectations of external business partners and stakeholders:

Engenda Group chooses its business partners carefully. We encourage our business partners to adopt similar high standards of ethical conduct to those contained within our Code of Conduct. If you are responsible for a business relationship with an external business partner or stakeholder you should ensure they meet our standards.

Testing whether the code applies

It may not always be clear when the Code of Conduct applies. In such cases there are a series of questions that can help you decide on the best course of action:

- Is this situation illegal?
- Is this situation dishonest or unfair?
- Would I be embarrassed if my family and/or friends were aware of my participation in this situation?
- Would our stakeholders be aggrieved if they knew of this situation?
- Is this situation covered in any section of the Code of Conduct?

If the answer to any of the above is “yes” then the spirit of the Code of Conduct should be applied.

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GOVERNANCE OF THE CODE OF CONDUCT

Every situation is different and our Code of Conduct cannot anticipate them all. As such we rely on our team members to make good choices and ask for help if ever they are in doubt. If you find yourself in a situation where you are not comfortable, you must speak up and promptly report any potential or actual violations of our Code of Conduct. If you find yourself in a situation where the code of conduct applies, you should as a minimum apply the guidance contained within the code. If you have any questions or issues, you should speak promptly with:

- Your supervisor
- Your Human Resource representative
- Engenda Group Managing Director
- Any member of the Board of Directors

In most cases, your supervisor should be able to manage the issue, however if a violation of the code is not resolved, please escalate it to another person listed above. All cases will be managed sensitively. Where possible, confidentiality and anonymity will be maintained and Engenda Group will keep those who report a violation informed about the action taken as a result of their report. Employees will not be penalized in any way for reporting a Code of Conduct violation in good faith.

Penalties for failing to follow the Code of Conduct

Violations of the Code of Conduct can lead to loss of business, reputational damage, legal action, fines and other legal action against the business. Engenda Group takes violations of the Code of Conduct seriously. Failure to follow the Code of Conduct may lead to disciplinary action up to and including dismissal, which will be commensurate with the level of violation. Those who break the law may find themselves and the Company subject to civil or criminal liability.

Engenda Group Ambassador

We expect all employees, contractors and anyone with responsibility for acting on behalf of Engenda Group to operate as an Engenda Group Ambassador. This means protecting the reputation of Engenda Group by upholding our Code of Conduct. Knowing the expectations of you is the first step. Being an Engenda Group ambassador also means putting the needs of the business first in everyday decision making. Our team operates in all corners of the globe. Laws, customs and practices will inevitably vary but Engenda Group’s standards must be taken as the minimum acceptable. Whether working away or at home, all employees are expected to uphold our standards when representing Engenda Group.

Doing the right thing is not always easy. We expect to continually improve the way we operate and this involves open and honest communication and listening to the feedback of our team and stakeholders. If you can support the improvement of Engenda Group, please let us know.

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BUSINESS PRACTICES

This section guides how we conduct our business and informs our decision-making processes. Human rights are universal and every person deserves to be treated with dignity and equality. Engenda Group believes business have a duty to respect and uphold human rights and with this in mind, has created business practices that create diverse and inclusive workplaces, invest in communities, and also engage employees to promote collective action. Our working practices are in line with the ten principles of the United Nations Global Compact.

Employment

Engenda Group respects the obligations it has in employing people and understands that achieving our mission is based on attracting and retaining the best people. For this reason, the core of our employment practice is fair and reasonable treatment of employees.

Engenda Group will ensure all employment practices are legal and moral. Engenda Group operates safe working environments and educates all team members about the part they play in maintaining this. Employees have freedom of association and so are able to raise issues or queries through their representatives. Engenda Group expects employees to contribute fairly and uphold their part of the employment relationship. To support this, Engenda Group has a robust recruitment process to ensure the right people are placed in the right roles and Engenda Group invests in training and development of all team members to ensure they have the right skills for the role.

Engenda Group ensures our working hours and remuneration packages are fair. Engenda Group is committed to ensuring a fair disciplinary practice, where all employees have the opportunity to answer allegations before disciplinary action is taken.

Equal Opportunities

Engenda Group recognise the importance of inclusive business practices. Our approach to equal opportunities and the avoidance of discrimination at work applies to all aspects of employment with us and service provision from us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment. We are committed to removing barriers for any section of society. We strive to collaborate with all our stakeholders to ensure we honour this commitment. We believe we engineer change best when we have a diverse range of perspectives within the decision-making process. We encourage our team members to use their unique experience and individual character to improve our business practices.

All candidates, employees, workers and clients will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (Protected Characteristics). Our Equal Opportunities Policy applies to all employees, officers, consultants, contractors, interns, casual workers, agency workers training delegates and clients.

Engenda Group encourages all team members and clients to be vigilant against all types of discrimination. Engenda Group conditions of service, benefits and facilities are reviewed regularly to ensure that they are available to all who should have access to them and that there are no unlawful obstacles to accessing them. Engenda Group encourages open communication so that any team member or partner can identify and escalate a violation of this or possible improvement to this.

Bullying and Harassment

Bullying and Harassment pollutes the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other employees not themselves the object of unwanted behaviour who are witness to it or who have knowledge of the behaviour. Engenda Group take a zero-tolerance approach to bullying and harassment. All employees are entitled to a working environment which respects their personal dignity and which is free from such objectionable conduct. Bullying and Harassment is a disciplinary offence and it will normally be treated as gross misconduct.

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Prevention of child labour, forced labour, bonded labour or involuntary prison
 We are committed to ensuring that there is no form of modern slavery or human trafficking in any part of our business, including our supply chain. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to enforcing effective controls to detect and eliminate it. Our recruitment process includes adequate checks to ensure the prevention of child labour, forced labour, bonded labour or involuntary imprisonment. Our Procurement Department operates an Approved Vendor List which involves a prequalification process that requires commitment to Modern Slavery legislation. Engenda Group chooses all business partners carefully, including recruitment specialists, to ensure they uphold the same high standards, regardless of geography. Engenda Group team members are aware of our commitment and their responsibilities to support this undertaking.

Health, Safety and the Environment
 Engenda Group aims to deliver a sustainable world class health, safety and environmental performance that results in zero harm to our stakeholders and environment. We believe this underpins our competitiveness in the market where customers rightly view health, safety and environment as a decisive factor in selection of suppliers. Engenda Group commits to upholding all applicable laws and regulations. We adopt standards, procedures and management systems to ensure our operations are managed in a safe, sustainable and ecological way. We focus on reducing our environmental impact, considering pollution, waste and impacts on biodiversity. Where possible we invest in environmental improvement. Our emergency planning process ensures we are equipped to deal with emergency situations

Sustainability
 In pursuit of achieving zero harm to our stakeholders and the environment, Engenda Group works towards sustainable procurement. Our Procurement Team operates with a view to achieving sustainable waste management, raw material usage, water usage, greenhouse gas management, energy usage and wherever possible collaborates with others to reduce our overall impact. All employees are expected to play their part in achieving sustainable procurement. We encourage all employees to make good choices when ordering everything from office stationery through to high end machinery.

Company Property
 Engenda Group property should only be used for legitimate business purposes. Company property includes computers, tools, cars, phones, intellectual property, business records, company money, company facilities etc. All employees are expected to take good care of Company property and not allow it to be misused by others. All damages and losses should be reported immediately.

Intellectual Property
 Intellectual property includes trademarks, domain names, patents, industrial designs, copyrights and trade secrets. Employees have a duty to protect Engenda Group’s intellectual property, and respect that of others. Subject to applicable laws, any inventions or discoveries made in the course of employment are Engenda Group’s property. Intellectual property is considered confidential information.

Business Records and Information Management
 Engenda Group’s Management System ensures records are kept in a fair and accurate manner. We will comply with all legal reporting requirements. It is never acceptable to falsify business records and doing so can be considered gross misconduct or even illegal in certain circumstances. Employees are expected to manage, store, archive and dispose of records in accordance with internal policy and legal requirements.

External Communications and Social Media

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In today’s interconnected world it is essential to carefully manage communications with our stakeholders and the wider public. Our day to day contact with third parties is managed via our management team and any official enquiries should always be redirected to an appropriate person.

All users of Engenda Group’s email system are expected to exercise care to ensure all sent items comply with business standards. As email is susceptible to interception, additional security measures should be taken when transmitting sensitive information. All external mail sent on business stationery or via the email system is representative of the Company and so it is essential that the tone, content and intent is professional.

Engenda Group has its own presence on social media which aims to promote the company, our services, our products and our people. Employees and stakeholders are invited to join us on social media. We expect a professional interaction on all our social media channels. This is not the place for employees to air internal grievances; in such instances, employees are required to utilise internal mechanisms such as the grievance policy. Employees with their own presence on social media should exercise care not to bring the Company into disrepute. For example, employees must not give their personal opinion as if it were that of Engenda Group. All employees are expected to exercise good judgement when using social media.

Confidentiality

Confidential information is information belonging to Engenda Group that is not in the public domain. It can include information obtained from third parties or under a non-disclosure agreement. Confidential information should never be disclosed to anyone other than the intended person(s) unless legally compelled to do so. Employees are expected to take due care so not to inadvertently disclose confidential information.

Whistle Blowing

Our commercial integrity is of the upmost importance. We are committed to operating with honesty and integrity at all times and expect all employees to play their part. As such we aim to avoid the need for anyone to become a whistle blower. However, if employees feel they have no other choice, they are protected in law when raising an issue as long as they do so in good faith.

Conflict of Interest

Engenda Group respects the right of all team members to have a private life. Where an employee’s private life may present a conflict of interest with their responsibilities to Engenda Group, whether real or perceived, they have a duty to inform Senior Management immediately so that an assessment of the impact can be made. Employees must not compromise themselves or the reputation of Engenda Group. Conflicts of Interest can present in many different forms, for example via a personal relationship with customers, suppliers or competitors, through access to information that could be seen to affect decision making or by interfering with your ability to perform your duties. In many instances, simple disclosure of the conflict is enough to resolve the issue. In complex cases, further action may be required.

Political Activity

Being an employee of Engenda Group does not exclude you from engaging in legitimate political activity. You must however, ensure that you separate your personal political views from that of Engenda Group. All political activity must be conducted in your own time, and must not use Engenda Group resources. Employees should take care not to bring the reputation of Engenda Group into disrepute through their political activity. Employees who intend to run for political office are advised to speak with a member of the Board to discuss the impact your political involvement may have.

Bribery and Corruption

Engenda Group employees are strictly forbidden from offering or accepting any form of illegal or improper payments. Employees of Engenda Group must never authorise or make a payment, favour or gift to a person in a position of

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authority, such as a government official, in order to achieve favourable treatment. Engenda Group property or assets must not be used for unlawful purposes.

Our success has come through hard work. We will always operate within the law, and in line with our own mission and values. In most of the countries in which we operate, competition or anti-trust laws define the relationships allowed with competitors, customers, and other third parties. Engenda Group employees must never engage in unethical or illegal activity to gain competitive intelligence. This includes price fixing, arranged market segmentation, monopolistic behaviour or corporate espionage.

Engenda Group will comply with local anti-corruption and anti-trust legislation wherever we operate. Employees who believe they are being coerced to engage in bribery or corruption should report the situation immediately to a member of the Board. Further information can be found in the Engenda Group Anti-corruption and Bribery Policy.

Illicit Trade

We would like to think Engenda Group is unique. Unfortunately, in today’s world counterfeiting is an issue. If you see or suspect someone/something of being counterfeit, for example person(s) passing themselves off as being members of Engenda Group, please report this to a member of Senior Management. If you believe we have been victims of receiving inferior or counterfeit products or goods, please escalate to Senior Management immediately. We expect all employees to be vigilant and not to work with sub-standard products.

Gifts and Entertainment

Our policy allows for reasonable and appropriate hospitality to be given to and received from third parties for the purposes of establishing or improving business relationships or for marketing Engenda Group. If you are unsure about the validity of a hospitality request or invite, you should raise the issue immediately with a member of the Board.

The giving or receipt of gifts may be appropriate in some circumstances, for example it is customary for token gifts to be given at Christmas time in the UK. In general, the value of the gift should be low and without a cash equivalent, e.g. a desk calendar is likely to be appropriate but a £50 gift card would not. Gifts must never be given with the intent of influencing a third party to obtain or retain a business advantage. All gifts given, must be done so on behalf of Engenda Group, not an individual. A record of all gifts and hospitality given or received must be made for auditing purposes.

Charity

Charitable donations can only be made with approval of the Managing Director. Engenda Group will only make donations that are legal and ethical under local law. All payments must be made with strict accuracy, through proper channels to ensure a full record it kept. Engenda Group will engage with the local community to ensure our presence is positive. Wherever possible we will interact at a local level to improve the communities we work within.

Money Laundering

Money laundering involves processing the illegal profits of crime into assets that appear to be of a legitimate origin. We should be vigilant to ensure Engenda Group is not used to launder money. This can be achieved by careful selection and vetting of all business partners. If you have any doubts or queries, please report your thoughts to a member of the Board.

Tax Evasion

The Board of Directors of Engenda Group will prevent the facilitation of tax evasion under the Criminal Finances Act 2017 by employees and external agents through risk assessment, awareness training, implementation of reasonable prevention methods and appropriate monitoring. All Engenda Group employees are made aware that tax evasion is illegal and that the company is committed to preventing tax evasion. Engenda Group encourages the use of the Whistle blowing procedure if employees feel financial crime is taking place.

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Trade Controls

Engenda Group is committed to complying with all trade sanctions and restrictions issued by recognised authorities, including the United Nations. These are designed to prevent or limit trading with particular countries. Trade controls is a volatile area and so anyone who may be affected should seek advice from Senior Management or legal counsel to ensure we adhere to the recognised sanctions. In some circumstances, import and/or export licenses are required. Professional advice on applicable trade controls must always be taken in these circumstances.

Quality and Client Care

The crucial differentiator of Engenda Group from its competitors is the exceptional level of quality and client care at the heart of everything we do. Our success is dependent on exceeding our client's expectations in order to drive satisfaction, confidence and trust. Our Quality Management System provides for mechanisms across all our processes and product life cycle to ensure our high standards. We work with our clients to gather valuable feedback to continually improve our processes. Engenda Group seeks various accreditations to publicly demonstrate our internal high standards. All employees are required to adhere to and uphold Engenda Group's high standards for Quality and Customer Care.

Where a client, delegate or any other stakeholder believes there has been an example of malpractice or maladministration with any service provision from Engenda Group, they are required to report the scenario to Engenda Group for resolution. There are a number of mechanisms available, including reporting the issue to your Engenda Group contact, using the Engenda Group Feedback tool via the website (which also allows for anonymous feedback to be given), or reporting the issue via Engenda Group's whistleblowing policy. Engenda Group is fully committed to resolving any issue reported, and where possible will respond in writing.

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