

Code of Conduct Policy



Contents

1.	Message from our Chief Executive.....	3
2.	Overview.....	4
3.	Health & Safety.....	5
4.	The environment.....	6
5.	Human rights	7
6.	Workplace behaviours.....	7
7.	Privacy and personal data.....	8
8.	Use of IT systems.....	8
9.	Conflicts of Interest.....	9
10.	Outside Interests.....	10
11.	Protecting our reputation.....	10
12.	Our customers.....	10
13.	Our Supply Chain.....	11
14.	Complying with laws and regulations.....	12
15.	Anti corruption and bribery.....	12
16.	Gifts and hospitality.....	13
17.	Fraud.....	14
18.	Anti-competitive behavior.....	14
19.	Confidential information.....	15
20.	Financial management and reporting.....	15
21.	Share dealing and inside information.....	16
22.	Community investment.....	16
23.	Speak up.....	17

1. Message from our Chief Executive

As a leading radiator manufacturer and supplier our core purpose is ‘helping to heat homes sustainably’. In our work to achieve this we are conscious that how we perform as a business impacts our customers, our workforce and our world and so we have established five values that provide our moral compass, these are the fundamentals of who we are and what we believe is right:

Respect – we harness the power of diversity and inclusion in our business, trust those we work with, and value everyone’s contribution;

Integrity – we operate with honesty, transparency and fairness in all we do;

Service – we act with empathy and humility, putting people and businesses we serve at the centre of what we do;

Excellence – we champion innovation, and use our energy, expertise and resources to make a positive difference to the environment;

Stewardship – we prize sustainability, and are passionate about leaving things better than we found them.

This Code of Conduct underpins our purpose and core values and sets out the standards of behaviour and business conduct expected from all Stelrad Group plc (The Group) employees.

I am committed to developing a culture where everyone does the right thing and takes personal responsibility for their actions. Ethical practice and transparency underpin our core values and are to the benefit of all stakeholders connected to our Group. I expect our core values to be integrated into the day-to-day performance of our work.

Regardless of where you are in the world our goal is to deliver best in class service to our customers and to work collaboratively with colleagues, suppliers, shareholders and the communities within which we operate. We aim to deliver exceptional performance by providing a safe, inclusive and great place to work. I am committed to providing supportive structures to achieve this, including provision and encouragement of training and development programmes, to facilitate the achievement of our goals.

This Code of Conduct also provides direction on a number of issues you may encounter in your day-to-day activities. It offers guidance on how you should take the right actions to protect our business and the wider interests of our stakeholders, including you and your colleagues. However, It’s not possible to provide guidance on every situation you will face and, if you are unsure about the right course of action, I would encourage you to seek advice from your line manager who will escalate the matter, if they are unable to deal with it directly. Finally, please ask your line manager if you are unclear about how to do the right thing and always speak up if you see or suspect wrongdoing.

Trevor Harvey
Chief Executive Officer

2. Overview

Why do we have this Code of Conduct?

This Code of Conduct sets out the standards of behaviour and business conduct we expect of all Group employees. We expect these standards, underpinned by the principle of doing the right thing, to be adopted by individuals whenever they are performing their day-to-day duties as employees of, or when they are representing the Group. All employees must take personal responsibility for ensuring that our commitment to sound and ethical business conduct is delivered.

Who does the Code of Conduct apply to?

This Code of Conduct applies to all employees and temporary workers of all subsidiary companies of the Group, wherever they are in the world. We ask our supply chain partners and others working on our behalf to share our values and follow our principles and practices. The use of 'we' in this document means you and me, in context some of the references are aimed specifically at management, it is hopefully self-evident, if you are in any doubt please do not hesitate to ask.

What is required of me?

You must read and understand this Code and take personal responsibility for complying with it at all times by doing the right thing when dealing with your colleagues, suppliers, customers and other stakeholders.

We have detailed policies which supplement the principles of this Code and are referred to throughout. You must familiarise yourself with these policies, which are available from your line manager or HR contact.

This Code provides a framework and guidance for ethical conduct but is not designed to cover all situations which you may encounter in your day-to-day activities. If you are faced with a decision about an ethical matter and are unsure what to do, you should ask yourself the following questions:

- What is the right thing to do?
- Is it legal, decent, fair and honest?
- How would it look if the issue was reported in the newspaper?
- Would I feel comfortable explaining this in a court?
- Am I personally comfortable with this?

Often, a common-sense approach, using these principles as guidelines, will be the right approach. However, if you remain concerned, you should seek further advice from your line manager. You should report any issues or concerns you may have regarding an actual or potential breach of this Code.

What about different laws and business practices in different countries?

The Group is committed to complying with the laws and business regulations in each of the countries in which we operate and the Code of Conduct applies globally. If any local laws or business practices permit a lower standard of behaviour, then we operate to the standards set out in this Code.

Where can I get further guidance?

If you require further guidance about what to do in a particular situation or about any issue which may arise, you can seek help from your line manager, your local HR manager or the Group Compliance team (compliance@srgl.com/ telephone: +44 191 261 3306).

What do I do if I am concerned about a breach of the Code of Conduct?

If you believe that you have experienced or witnessed behaviour which does not meet the standards required by the Code, you have a responsibility to do something about it. You may first wish to discuss the matter informally with your line manager. For more serious issues, you should follow our Whistleblowing Policy which provides a mechanism by which employees can report concerns about the application of the Code or about business practices more generally. Reports may be made anonymously if you wish.

If you believe you are being treated unfairly as a consequence of raising a concern, you should report the matter to the Group Compliance team. Any such claims will be investigated thoroughly. Anyone who is found to engage in retaliation or reprisal will be considered to be in breach of this Code.

What if something goes wrong?

Sometimes things can go wrong, we can all make mistakes. So, if you notice something has gone wrong, what do you do? You must not ignore it. Our policy requires you to report it. Ignoring it does not solve it – it may make things worse.

What are the consequences of breaching the Code of Conduct?

The Group regards any failure to comply with the Code as a serious issue. Accordingly, breaches of the Code may be dealt with as misconduct and the Group may take disciplinary action, up to and including dismissal.

Related Policy* Whistleblower Policy

3. Health & Safety

We are committed to prioritising the health and safety of our people, and of those around us. Our fundamental belief is that everyone has the right to return home safely at the end of each working day. Our manufacturing operations in Mexborough, Nuth and Corlu have achieved ISO45001 and we are expected to maintain this international safety standard which provides policy and process to be followed by us all.

Each of us is responsible for acting in a way that protects ourselves and others.

We always

- work to continuously improve health and safety practice, believing that nothing we do is so important that we cannot take the time and effort to do it safely
- take steps to understand and comply with applicable health and safety rules and procedures, both for your own safety and the safety of others
- use the correct PPE (Personal Protective Equipment) required for the task being performed
- work in a way that protects the health and safety of those you come into contact with remain aware of the risks and hazards in your workplace and seek to reduce the potential for harm

- ensure that you and members of your team have the skills and resources required to perform your roles safely
- commit to promoting and embracing a positive health and safety culture
- report potential hazards and concerns through the appropriate channels and take action to intervene and stop work if you consider you or others may be at risk
- comply at all times with all applicable health and safety requirements
- know what to do if there is an emergency
- report to work in a fit state to carry out our duties, free from the influence of alcohol, illegal drugs or other impairing substances

We never

- ignore or circumvent health and safety rules and procedures
- take unnecessary risks or put others in danger as a result of our actions
- carry out tasks we are not fit, trained or qualified to perform
- accept the idea that our work is inherently dangerous and accidents can not be avoided
- condone or walk by unsafe practices

Each of our manufacturing operations have their own respective health & safety policies, which are made available to all employees; there is a strong focus in each of our operations on our employees understanding and complying with our health & safety policies.

4. The environment

We aim to reduce our own environmental impacts and contribute to the resolution of environmental issues. This means that we acknowledge we have a key part to play through minimising the carbon footprint and other environmental impacts of our operations. Additionally, we will work with suppliers and with customers to contribute towards the decarbonisation of our industry. Working together with our suppliers and customers we can ensure the long-term sustainability of our business.

We always

- comply with environmental laws, policies and procedures
- assess the environmental impact of what we are doing to enable us to incorporate sustainable environmental solutions where we can
- act to protect local ecology and biodiversity and seek ways to reduce impact on our neighbours
- incorporate energy efficient solutions into our operations
- work to be efficient in the way we use fuels, materials and water
- minimise waste at our sites and commit recycling

We never

- waste environmental resources
- allow risks or incidents to go unreported

Relevant Policy* Environmental Policy

5. Human rights

We firmly believe in treating people fairly and with dignity and respect in compliance with the law. We recognise that the key human rights areas our industry could be affected by are modern slavery and human trafficking among directly hired employees, agency workers, subcontractor operatives and our workers in our supply chain.

We always

- prohibit the use of forced labour
- verify that all employees and temporary workers have the right to work in the country applicable when they commence employment
- make all employees aware of their working hours, leave and absence entitlements and other employment benefits
- comply with minimum wage and age requirements
- require suppliers and subcontractors to provide, when asked, a copy of their Modern Slavery Statement, or other document detailing the steps taken to ensure that labour exploitation or modern slavery does not take place within their operations or supply chains.
- work with subcontractors who share our values
- ensure we understand and comply with all relevant laws, policies and procedures

We never

- employ people on forced or compulsory basis or use child labour
- exploit our people or those who work with us
-

Relevant Policy*: Sustainable Procurement Policy; Modern Slavery Statement.

6. Workplace behaviours

We are an equal opportunities employer and we enjoy, promote and value a diverse workforce. We operate an inclusive environment where everyone has an equal opportunity to achieve their potential. We do not accept any form of discrimination against colleagues or others who we come into contact with in connection with our work.

No individual or potential candidate receives more or less favourable treatment based on their age, race, colour, religion, beliefs, nationality, national origin, ethnicity, gender, sexual orientation, marital or civil partnerships, disability, pregnancy or maternity or paternity, responsibility for dependents, political or personal convictions, membership of trade unions or any other protected characteristic. We do not tolerate harassment or bullying on any grounds and act respectfully towards all.

We always

- respect people's differences and treat everyone with dignity and respect
- create an inclusive culture in which everyone feels valued as an individual and is motivated to give their best in their job
- provide equality of opportunity to all current and potential employees across the employment cycle and treat individuals in a fair and consistent manner
- ensure the people we recruit share the same values, behaviours and attitudes as our business

- appoint, promote and reward people based on merit
- support every individual to achieve their potential
- ensure we understand and comply with all relevant laws, policies and procedures

We never

- accept or encourage discrimination or treat anyone more or less favourably than another based on the characteristics described above
- make unwelcome advances on other individuals
- victimise individuals or groups
- behave in a way that is, or could be perceived as, unwelcome, malicious, offensive, discriminatory, intimidating or derogatory, or share inappropriate jokes or offensive material.

Relevant Policy* Equality, Diversity and Inclusion Policy.

7. Privacy and personal data

We are committed to being transparent about how we collect and use the personal data of employees and others and to meeting our data protection obligations. We respect the personal privacy of employees in accordance with applicable data protection laws and acknowledge that employees and others have rights regarding the handling of their personal data.

We always

- process personal data only in accordance with relevant data protection laws
- ensure that personal data in our possession is treated in a confidential and secure manner and is safeguarded from loss, disclosure or misuse

We never

- access personal data for any reason other than a legitimate legal or business reason
- transmit personal data to anyone in the organisation or a third party without proper authorisation and a legitimate legal or business reason for doing so

Related Policy* Information Security Policy

8. Use of IT systems

We use our IT systems appropriately and responsibly. We will use our IT systems and equipment for their intended purpose of promoting effective communication and working practices within our business. We will safeguard IT assets in our possession from loss, disclosure or misuse.

We always

- comply with all applicable laws, policies and procedures governing the use of our IT systems
- take appropriate measures to prevent access to our IT systems by complying with our information security requirements
- immediately report any loss of equipment, unauthorised access or other suspicious activity involving our IT systems of which we become aware

We never

- use our IT systems for any activity which may be illegal, offensive, discriminatory, unethical or immoral
- destroy or cause intentional damage to our IT assets and data stored thereon (except as properly authorised).

Relevant Policy* Information Security Policy

9. Conflicts of Interest

A conflict of interest is a situation where an individual or organisation has competing or multiple interests (be they personal, business or financial) and serving one interest could work against another. If a conflict of interest arises, we notify our manager as soon as we become aware of it.

We always

- make decisions that represent the best interests of the company by avoiding situations where our personal circumstances may conflict with the Group's
- we declare potential conflicts when they arise to our manager
- avoid direct and indirect conflicts between our personal interests and those of the Group, its customers, suppliers and other stakeholders
- avoid situations where our motives could be questioned
- record them on the appropriate conflicts of interest register if required
- disclose to our manager if we know someone who holds influence in an organisation we are working with
- declare any interests we have in other organisations
- gain prior consent from the business to take part in any employment or business venture outside of our employment with the Group
- ensure we understand and comply with all relevant laws, policies and procedures

We never

- inappropriately use our position, contacts or knowledge gained in a business context for personal profit or benefit, or to benefit friends, family or associates
- encourage the Group to engage an individual or supplier with a personal connection, unless it has been approved
- have any direct or indirect personal financial interest in any business with which the Group has dealings, unless that interest is fully disclosed and approved in writing by a member of the Board (Holding five per cent or less in the shares of a company held as investment is an exception.)
- use the resources of the Group for private or non Group purposes without specific permission
- make political contributions, including non-cash contributions such as the use of the Group's facilities, services or employee time

Relevant Policy* Conflicts of Interest Policy

10. Outside Interests

We support employees who wish to take up additional voluntary or charitable appointments outside of the Group where such appointments do not conflict with their duties and there is no risk of reputational damage to the Group. We will also endeavour to support employees who wish to take up outside appointments for personal development reasons, where the experience they gain will be beneficial to their role within the Group and where there is no conflict of interest.

We always

- devote our energies whilst at work to pursuing the interests of the Group
- seek prior approval before undertaking any community or charitable work, which might require the use of company time or equipment
- consider the impact that certain activities outside of the workplace, for example of a political or activist nature, may have on the Group's business and its reputation

We never

- engage in any outside occupation or interest that is dependent on the use of company time or equipment without prior approval
- agree to take up an appointment as a director, whether executive or nonexecutive, of a third-party company without prior approval from your line manager
- engage in activities outside of work which may reflect adversely on the Group's reputation

Relevant Policy* Conflicts of Interest Policy

11. Protecting our reputation

We recognise that the Group's reputation is one of its key assets and we will not take any action or engage in any behaviour, either at work or outside of the workplace, which may cause reputational damage to the Group or any of its employees.

We always

- act in a way which protects and promotes the Group's good reputation at all times

We never

- make disparaging or damaging remarks about the Group or any of its employees or stakeholders, whether verbally, in writing, electronically via email or the internet or via social media
- engage in any activities outside of work which may reflect adversely on the reputation of the Group

12. Our customers

Providing our customers with high quality products and outstanding service is key to the success of our business. We believe that we should apply our core values to our relationships externally as well as internally.

We always

- earn the trust and confidence of our customers
- do what we say we'll do and endeavour to keep our promises
- communicate honestly and transparently and encourage feedback to enable continuous improvement
- work with professionalism, demonstrate competence and add value where we can
- provide the highest standards of customer service by following our customer satisfaction processes
- seek to develop long-lasting, value adding relationships
- aim to resolve potential issues amicably and as early as possible
- act respectfully and with integrity, never include in an email what we wouldn't want to be heard
- ensure we comply with all relevant laws, policies and procedures

We never

- knowingly neglect or breach contractual agreements
- act unprofessionally, dishonestly or unfairly
- ignore or fail to act on customer feedback

13. Our Supply Chain

We are committed to working with our supply chain to develop mutually beneficial relationships by promoting our practices and principles, and treating them with fairness, respect, trust and transparency..

We always

- select our suppliers in a fair way, based on skill, competence and best value
- communicate our Sustainable Procurement Policy
- seek to ensure the relationships we build are effective, optimised and deliver enhanced benefits to all parties
- consider sustainability and Environmental, Social and Governance issues in selection of our supply chain
- communicate openly and transparently
- follow our procedures on bribery and corruption
- avoid conflicts of interest
- resolve disputes at the earliest stage
- strive to meet contractual obligations
- commit to paying our supply chain in line with our mutually agreed contract terms

We never

- share confidential information
- hide conflicts of interest
- do anything that would compromise fair competition

Related Policy* Sustainable Procurement Policy; Anti-Corruption & Bribery Policy

14. Complying with laws and regulations

We are committed to conducting our business in accordance with applicable laws and in a responsible manner. We must comply with all applicable laws and regulations. Employees are provided with information in relation to complying with laws and regulations, relevant to their business area.

We always

- ensure that we understand the relevant legal requirements which apply to our roles or business, by obtaining appropriate advice if necessary
- apply our standards, even in situations where the applicable or local law is less restrictive than those standards
- seek advice if we become aware of any breaches of laws or regulations by our business or our employees

We never

- ignore rules for expediency
- turn a blind eye if you know or suspect others may be breaking the law
- cut corners on cost grounds

15. Anti-corruption and bribery

The Group is committed to the highest standards of integrity and ethical conduct globally. We define bribery as the act of offering, giving, requesting or receiving money, goods or any form of advantage with a view to the maintenance of behaviour or influencing decisions. This includes excessive gifts and hospitality, given or received (refer to the gifts and hospitality section below), and the offer of employment or engagement on a contract of any other type, and does not need to benefit an individual personally. Facilitation payments are payments or other benefits paid to officials to encourage them to do something which they were already going to do, such as issue a permit or visa sooner than they would have otherwise done, these are also considered bribes and are also prohibited. Corruption is illegal, dishonest or fraudulent conduct by those in positions of power or authority. It can include bribery, blackmail, money laundering, deception, extortion and collusion.

Bribery and corruption are serious criminal offences and anyone offering, giving, requesting or taking bribes, or exhibiting corrupt behaviour, will be subject to disciplinary action which is likely to result in dismissal and potentially prosecution. To be clear, we have a zero-tolerance approach to bribes, corruption and fraud of all kinds.

We always

- use appropriate caution when accepting or offering gifts, entertainment and hospitality and follow the rules with respect to pre-authorisation and declaration
- declare and record in a timely manner gifts and hospitality given or received
- ensure we understand and comply with all relevant laws, policies and procedures

We never

- offer or make payments, or other favours, to someone where we suspect that it could influence them to misuse their position
- misuse our positions in connection with payments, or other favours, for ourselves or others

- make political donations
- make charitable donations on behalf of the company without pre-authorisation
- offer or give payments, other favours, to public officials to seek business gain
- allow or give consent to others to do any of the above

Related Policy* Anti-Corruption & Bribery Policy; Whistleblower Policy

16. Gifts and hospitality

Gifts include any token of appreciation and gratitude, gift vouchers, physical gifts or other items of value received or offered.

Hospitality can include attendance at social events, functions, sports matches, theatres or other occasions such as business lunches or dinners, whether they include a business purpose or not, and again whether received or offered.

Exchanging gifts and hospitality can build goodwill and, in most cases, reasonable and modest gifts or hospitality intended to foster cordial business relationships are acceptable under this code and the law. Caution must be exercised and pre-authorisation sought, anything seen as lavish or excessive, or anything that could lead to questioning the motive of the action, should not be accepted or offered.

We always

- take care to ensure gifts and hospitality, both given and received, are reasonable and within Group guidelines
- accurately record and disclose the exchange of gifts and hospitality, following the preapproval process
- ensure that corporate hospitality always includes representatives of the company to which we are giving or from which we are receiving the hospitality
- ensure we understand and comply with all relevant laws, policies and procedures

We never

- accept or offer gifts or hospitality if they could be seen to influence decisions or create preferential treatment or a sense of obligation
- accept gifts or hospitality that prejudice, or could be seen to prejudice, our integrity or impartiality
- give or receive cash or a cash equivalent to or from a third party
- encourage or allow third party contributions to company or internal social events

Related Policy*: Anti-Corruption & Bribery Policy; Whistleblower Policy

17. Fraud

Fraud is a type of criminal activity in which someone uses deception or dishonesty for their own gain or to cause a loss to another party. It can include deception by false representation, false accounting, forgery, failing to disclose information and abuse of position. Making false claims also qualifies as fraud, this can include inflating claims as well as claiming for things we are not entitled to claim. We operate with integrity and none of our working relationships with customers, suppliers or partners should be tainted with fraudulent or dishonest conduct

Identifying fraud

Sometimes the way other people behave can cause us to be concerned about fraudulent conduct. Below are some warning signs that may indicate potential fraudulent activity:

- significant and unexplained changes in behaviour
- transactions that take place at an unexpected time, are unusual in frequency or amount, or involve unexpected recipients
- internal controls not being properly enforced or being overridden
- discrepancies in accounting records, purchase orders or invoices, or unexplained items appearing in reconciliations
- missing documents, or only photocopied documents are available when an original is required
- inconsistent, vague or implausible responses to enquiries
- discrepancies between paperwork and verbal explanations
- missing inventories of physical assets
- excessive voids or credits
- alterations or other unusual inaccuracies in documents
- a person appears to exercise excessive control of a process from start to finish, with no segregation of duties
- a person is resistant to others taking over, seeing their work, or avoids taking time off.

We always

- work in an open, honest and ethical manner
- keep accurate and complete records and accounts in relation to work and expenses
- diligently check invoices, contracts and other official documents
- ensure we understand and comply with all relevant laws, policies and procedures

We never

- alter figures, letterheads, dates or information on documents in a way that could mislead
- mislead people we do business with or cause them to be misled by our actions or omissions
- proceed with transactions where we have concerns or suspicions about criminal activity
- record costs against different codes or projects in order to conceal or suppress actual costs

18. Anti-competitive behavior

We will comply with competition laws. We will compete fairly, we will not resort to anticompetitive behaviour and we will not tolerate such behaviour from employees or anyone else acting on our behalf. This means that we do not partake in bid-rigging, price-fixing, market sharing, cover pricing or solicit information in competitor bids and we do not condone redlisting.

Anti-competitive behaviour is likely to be a criminal offence, which could result in fines and imprisonment.

We always

- bid contracts and tenders independently from and without any agreement with our competitors
- inform others that confidential commercial matters that could affect competition cannot be discussed in our presence at trade meetings. If such discussions continue, we leave and request our departure is minuted
- treat competitively sensitive data such as current or future pricing arrangements and intentions as confidential
- require all employees who have joined the Group from a competitor to respect the confidential information of their previous employer

We never

- obtain or use information on competitors, customers or suppliers which has been obtained by illegal or disreputable means
- discuss pricing, discounts, rebates, market share, investments or terms and conditions relating to delivery terms or warranties with a competitor
- enter into discussions with competitors about sharing or restricting access to markets or customers

19. Confidential information

We are committed to protecting the Group's confidential information and we take all necessary steps to protect it.

We always

- keep confidential information protected and secure at all times
- respect any conditions imposed by third parties on the use of their confidential information
- ensure confidential information is only shared on a "need to know" basis and, in the case of a third party's confidential information, with their consent
- promptly report any unintended disclosure of confidential information

We never

- disclose confidential information to any third party without entering into an effective confidentiality agreement
- use confidential information for our personal gain or benefit or for any illegal purpose

Relevant Policy*: Information Security Policy

20. Financial management and reporting

We will maintain proper and accurate business and financial records. We will ensure that our financial transactions are recorded in a timely manner and that our assets and liabilities are properly reflected in our financial records, in accordance with relevant accounting standards applicable to and adopted by the Group. We are committed to the prevention and detection of fraud and will report fraudulent activity, which may be a criminal offence, to the relevant authorities. We will not support activities designed to evade taxes.

We always

- comply with statutory and Group management accounting standards
- demonstrate transparency with regards to all financial transactions
- utilise appropriate internal controls to enable the accurate reporting of the Group's results

We never

- deliberately make a false or inaccurate entry in any company records or books of account
- artificially manipulate the financial results of a period to show a position which is better than actual
- facilitate or assist in tax evasion by a third party

21. Share dealing and inside information

The Group will control the use of inside information relating to the Group and will implement controls to prevent dealing in the Group's shares whilst inside information exists. The Group's shares are listed on the London Stock Exchange. We will follow the market's rules in relation to any inside information relating to the Group. Employees must not profit from the possession of any inside information and must not deal in the Group's shares when they are in possession of any inside information.

We always

- comply with the internal procedures established to ensure that information which may constitute inside information is identified and reported promptly
- obtain any required internal approvals before dealing in the Group's shares

We never

- whilst in possession of inside information about the Group, buy or sell the Group's shares or disclose the inside information to third parties who may wish to deal in the Group's shares
- whilst in possession of inside information about third parties, use that information to deal in the shares of those companies
- knowingly or recklessly make a misleading statement or forecast or create a false market in the Group's shares.

Related Policy*: Group-wide dealing policy; Share dealing code; Dealing procedures manual; Insider dealing & market abuse policy; Policy on preparation and maintenance of insider lists.

22. Community investment

We acknowledge our commitment to ensure the responsible operation of our business, having regard to the wider community. We recognise that each of the Group's businesses has an important role to play in its local community and we therefore encourage community interaction for the benefit of the Group and its stakeholders. We support charitable organisations which are directly linked to benefit people in our local areas and communities.

We always

- only make charitable donations in full compliance with all applicable laws and regulations and our Anti-Corruption & Bribery Policy
- ensure all charitable donations are properly recorded
- encourage and support employees who wish to undertake voluntary work in their community

We never

- make any charitable donations to any expressly prohibited organisations

Related Policy*: Anti-Corruption & Bribery Policy

23. Speak up

If you believe that you lack the appropriate training in any aspect related to this code of conduct then speak to your line manager or HR contact. If you are concerned about wrongdoing in contravention of any aspect of this code of conduct please speak up. You can contact your line manager or HR contact, if you would prefer you can contact the Group Compliance team at:

Email: compliance@srgl.com

Telephone: +44 191 261 3306

Related Policy*: Whistleblower Policy

Related Policy*:

Where a related policy is referenced, it is a Group Policy. Within each area of the business, the Group Policies are supplemented by local policies and employee handbooks as appropriate.

Policy review

The document will be reviewed and approved every two years.

Responsibility for document: CPO

Effective date: March 2022

Frequency of review: Every two years

Next review date: October 2025

Version control

Date	Version	Reason for change	Author
March 2022	1.0	Initial release	CPO
October 2023	2.0	Updated to reference introduction of additional group policies	C PO