

Savant Limited

Code of Business Ethics



Our Code of Business Ethics (as detailed below) applies to business conducted by Savant and to our employees. Compliance with our Code helps to sustain and enhance Savant's good reputation and contributes to long term value creation for the employee owners. We believe that every employee plays a vital part in building and strengthening Savant. We operate a non-retaliation policy: any employee who in good faith reports any act of apparent misconduct or unethical behaviour will not be victimised or treated adversely.

We comply with the law

1 Compliance with laws

- 1.1 Savant Limited and its subsidiary companies ("Savant"), its employees and agents, are required, as a minimum standard, to comply with all the laws and regulations of any countries in which they operate.

We compete fairly

2 Competition

- 2.1 Savant believes in competing fairly and vigorously in its market sectors. Savant does not engage in, nor is it party to, agreements, business practices or conduct that, as a matter of law, are anti-competitive.

We act with integrity in all our business dealings

3 Proper Business Behaviour

- 3.1 Savant expects its employees to act with integrity at all times to safeguard the trust in which Savant is held by its customers, employee owners, suppliers and other individuals and organisations with which our businesses interact.
- 3.2 No employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with Savant, or which might compromise their ability to meet the responsibilities of their job.
- 3.3 Savant does not offer, promise, give, demand or accept bribes or other unethical advantage in order to obtain, retain or give business or other advantage.
- 3.4 Savant employees who have access to privileged information (including proprietary and confidential information, whether belonging to Savant or others) must not use it to achieve personal gain for themselves or others.
- 3.5 Savant employees must ensure proper and responsible use of all Savant's assets, including physical property, intangible assets, IT equipment and communication resources.

We treat suppliers, partners and customers properly

4 Dealings with Suppliers, Business Partners and Customers

- 4.1 Savant's suppliers are paid promptly within agreed terms of business.
- 4.2 Savant seeks to provide its customers with products and services, which meet or exceed their requirements, through the application of quality management systems and continuous improvement programmes. These are designed to develop and apply innovative ideas, to respond quickly to changing customer demand and to improve continuously product quality, value and delivery times.
- 4.3 Savant believes in working in partnership with its suppliers, so as to meet the expectations of Savant customers, and to ensure quality, value and timeliness throughout the supply chain.
- 4.4 Savant employees must respect and treat in accordance with agreed terms the technology, intellectual property, confidential information and any other assets or data received from customers, suppliers and others.
- 4.5 Savant expects agents, suppliers and others working on its behalf to act lawfully and ethically, and in accordance with the values and standards set out in this Code.

We treat our co-workers respectfully

5 Employees

- 5.1 Savant recruits, selects, and promotes employees on the basis of their qualifications, skills, aptitude and attitude.
- 5.2 In employment related decisions, Savant complies with anti-discrimination requirements in the relevant jurisdictions concerning matters of race, colour, national origin, gender, marital status, sexual orientation, religious belief, age or physical or mental disability.
- 5.3 All Savant employees shall be treated with respect and dignity. Accordingly, any harassment or bullying is unacceptable.
- 5.4 Savant respects the rights of each employee to join or not join a trade union or other bona fide employee representative organisation.
- 5.5 Savant believes in good communications with employees and in promoting consultation, co-operation and teamwork on matters of mutual concern.

We contribute to healthy, safe and secure workplaces

6 Health, Safety and Security

- 6.1 Savant is committed to conducting all its activities in a manner which achieves the highest practicable standards of health and safety.
- 6.2 Savant seeks to protect its employees, physical assets, information and reputation from potential security threats.

We respect the environment

7 Environment

- 7.1 Savant is committed to ensuring that, as far as reasonably practicable, any detrimental effects of its activities, products and services upon the environment are minimised.

We contribute to our communities

8 Communities

- 8.1 In addition to the provision of employment opportunities and training and development activities, Savant seeks to contribute to the communities in which it operates by participation in, and support for, community and charitable initiatives.
- 8.2 Savant properly pays the taxes arising on its operations and activities whenever and wherever due.

We participate in relevant public debates

9 Public Activities

- 9.1 As and when appropriate, Savant engages with governments, government departments, agencies and other organisations in relation to issues which affect its legitimate business interests, either directly or through trade associations or other similar bodies.

We respect human rights

10 Human Rights

- 10.1 Savant seeks to uphold all internationally recognised human rights wherever its operations are located.
- 10.2 Savant adheres to all relevant government guidelines designed to ensure that products are not incorporated into weapons or other equipment used for the purposes of terrorism or abuse of human rights.

We have high standards of financial record-keeping and reporting

11 Reporting and Internal Controls

- 11.1 Savant records all business transactions accurately, prudently and transparently, in accordance with the Law and best practice.
- 11.2 Comprehensive assessment and management of risk, together with strong systems of internal control, are essential aspects of Savant structure and serve to ensure that it is managed effectively and that reported results are accurate.

The Code applies to all of us

12 Application and Compliance

- 12.1 Our Code applies throughout Savant. It can be made available in any reasonable format is available on the Savant's internet and intranet sites. Disregard or breach of the Group Code by an employee may result in disciplinary action.
- 12.2 Our Code is not intended to replace existing policies of Savant. It serves as a governing document to which other policies must adhere.
- 12.3 Where Savant is a participant in any joint venture or commercial sharing arrangement, Savant seeks, as far as practicable, to ensure that the combined vehicle complies with our Code.
- 12.4 Savant expects and encourages employees to bring promptly to management's attention any suspected or actual breaches of our Code. Any employee making such information known through the appropriate channels will not face any adverse or unfavourable treatment for such disclosure.

Obtaining Advice and Reporting Issues

Any queries, requests for guidance or reports of alleged breaches in relation to the Code can be raised via your line manager or any Director. All reports are treated confidentially and investigated properly and promptly.

Governance

Savant's Management Team has overall responsibility for the Code. The Business Management System's Internal Audit function reports to Savant's Management Team on the effectiveness of internal controls and on the ongoing risk management process for identifying, evaluating and managing significant business risk. This takes the form of a Monthly Report.