



Corporate Governance

# Group Code of Conduct

<b>Owner</b>	Group General Counsel & Company Secretary
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## INTRODUCTION

**The success of our business relies on all employees operating in an ethical and responsible way. We assess ourselves on what we achieve through our operational and financial performance, but it is equally as important to recognise that the way in which we achieve our results also reflects and impacts on the business. Our reputation relies on the trust and respect from our customers, suppliers, shareholders and the general public, therefore we must hold ourselves accountable to uphold our ethical standards.**

This Code of Conduct outlines the standards that the SIG plc Board of Directors and Executive Leadership Team will uphold and the conduct we expect of all employees across the Group. It should also influence your decision making when selecting any contractors, suppliers or third parties to represent or work with, or on behalf of, SIG.

Whilst the Code of Conduct provides guidance on how to manage certain situations and where to go for advice, we always expect employees to use sound judgment and strive to do the right thing at all times.

The Code of Conduct is supported by our Group and local policies, procedures and guidelines that are designed to protect the business and our employees from legal, financial and reputational risk.

Any breach of the policies, guidelines or legislation referred to in this Code of Conduct may result in disciplinary procedures being applied, up to and including dismissal from SIG.

*In this document 'SIG' refers to SIG plc and its affiliate companies. 'Our' and 'we' refers to SIG plc.*

## USING THE CODE OF CONDUCT

This document is designed to provide guidance and an overview of our ethical standards and expectations. Where applicable, it will direct you to any associated policies. You are also expected to be aware of and adhere to Group and local policies and any relevant laws and legislation in your country. If you need any further guidance, you should contact your line manager or local HR team.

In this document you can find guidance in the following areas:

- Compliance with laws and regulations
- Raising concerns
- Diversity and equal opportunities
- Human rights
- Modern slavery
- Unacceptable behaviours, bullying and harassment
- Health, safety and environment
- Ethical trading
- Anti-bribery and corruption
- Gifts and hospitality
- Conflicts of interest
- Dealing in SIG shares
- Political contributions
- Confidential information
- Data protection
- Community and charity involvement

## COMPLIANCE WITH LAWS AND REGULATIONS

We are obliged to adhere to local laws, legislation and regulations that may apply to any or all of the countries in which we operate. We will always aim to co-operate fully with relevant public authorities and regulatory bodies. If in doubt, please contact your local HR team for guidance.

## RAISING CONCERNS

All employees have the right to raise any genuine concerns they may have about unethical behaviours or practices without fear of any reprisal, discrimination or victimisation. If you have a concern, you should raise this with your line manager, supervisor or your local HR team in the first instance. Alternatively, the Group operates a Whistleblowing Policy and procedure, which allows you to raise any concerns confidentially and/or anonymously.

You can find further guidance in the [Group Whistleblowing Policy](#).

## DIVERSITY AND EQUAL OPPORTUNITIES

We recognise the value of a diverse workforce and appreciate the contribution of all employees around the Group. We do not tolerate discrimination in any form. We are committed to providing all employees with equal opportunities, regardless of race, religion, gender, sexual orientation, disability, age or political beliefs.

We offer equal opportunities to all existing and prospective employees and we value inclusion and diversity of thinking. Our recruitment processes aim to employ on ability and all employees are afforded equal opportunities in their development and career progression within the business.

You can find further guidance in the [Group Diversity, Equality and Inclusion policy](#).

## HUMAN RIGHTS

We respect and aim to protect the human rights of everyone associated with SIG. We aim to act with due diligence at all times to avoid any violation of human rights. We expect all employees to take responsibility in upholding these standards when considering any third party associations, for example customers, suppliers or contractors.

We will ensure that all employment is freely chosen, wages and working conditions are fair and that we adhere to all legal minimum age requirements in our operating countries.

You can find further guidance in the [Group Ethical Trading and Human Rights Policy](#).

## MODERN SLAVERY

We have a zero-tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner and with integrity and transparency in our business dealings. We have taken steps in our operations to ensure that slavery and human trafficking is not taking place within any part of our business or within our supply chains.

If you become aware of anything that you think may constitute modern slavery, you should make your line manager aware in the first instance. Alternatively, you can contact your local HR team, or you can report this through the Whistleblowing procedure.

Our annual Company statements on modern slavery can be found on our external website.

## UNACCEPTABLE BEHAVIOURS AND HARRASSMENT

Our aim is to provide a respectful and professional working environment. We have a zero tolerance approach to any unacceptable behaviour or harassment. We expect employees across the Group to be sensitive to behaviours that may be deemed as unacceptable across different cultures, or that may be seen as unwelcome conduct, bullying or harassment. If you

become aware of any instances where these standards have not been met, you should report this to your line manager or local HR team. All reports of unacceptable behaviour will be investigated and employees raising concerns in good faith can expect to do so without any retaliation or detriment.

## HEALTH, SAFETY AND ENVIRONMENT

The welfare of our employees, visitors, contractors and any others associated with our operations is of vital importance.

We continually strive to improve our performance through training and awareness in preventing hazards and unsafe practices. We expect all employees to know and adhere to all applicable Group and local health and safety laws and to ensure that they always conduct their work in a safe manner.

In addition, we also recognise our obligations to take care of the environment through the prevention of pollution, and the implementation, monitoring and auditing of good environmental practices. As a minimum standard, the Group across all of its businesses will meet the requirements of all legal, industry and other adopted standards. The Group monitors and proactively manages its impact on the environment, striving to go beyond the requirements of local legislation. Where applicable external verification schemes have been adopted, and verification schemes such as Forestry Stewardship Council (F.S.C.) have been adopted to ensure when specified, timber from sustainable sources have been utilised in the manufacturing process and the supply of products sold.

As a UK company, we are certified to ISO 14001 Environment and OHSAS 18001 Occupational Health and Safety standards. We expect all employees to uphold health and safety standards, and support the business in identifying any risks. If you see something that may be of concern or does not meet these standards, you should raise this with your line manager.

You can find further guidance in the [Group Health and Safety Policy](#).

In addition, further information for employees can be found on our standards and expectations in the Group Alcohol and Substance Misuse Policy.

## ETHICAL TRADING

The success of our business relies on upholding our reputation in the marketplace. This is influenced by the way in which we deal with our customers, suppliers, advisors, contractors and any other third parties with whom we engage. In addition, we are governed by trading laws which we are legally obliged to adhere to, particularly in any connection to our competitors.

We are committed to treating our customers and competitors with respect and our trading and any associated activities will be fair and ethical.

It is our commitment to provide information that is factually correct and accurate, including promotional materials, information on prices, schedules, services and other terms of business, or any other information we may offer to our customers, suppliers, contractors, advisors or representatives. We will not exaggerate any claims, falsely advertise or offer anything that may misrepresent our intentions.

Employees are expected to ensure that any information they may provide is accurate and ensure that any contracts arranged with customers, suppliers or any other third parties are aligned to our ethical trading standards.

Collaboration with competitors to establish or maintain prices or to unlawfully prevent trade will not be tolerated. Whilst gathering appropriate commercial information is acceptable, seeking to gather information from competitors with the intention to gainfully damage that business is not permitted under any circumstances.

It is the responsibility of all employees to ensure that any copyright, trademarks, patents or other registered intellectual property of others are respected. Any instances of knowingly infringing these laws will leave the company open to significant risk, and may lead to disciplinary procedures up to and including dismissal from SIG.

If we receive any complaints from customers, suppliers, contractors, anyone associated with the business or the general public, it is our commitment to deal with these promptly and fairly and reach an agreeable resolution.

You can find further guidance in the [Group Ethical Trading and Human Rights Policy](#).

## ANTI-BRIBERY AND CORRUPTION

We operate a zero-tolerance approach to the giving, receiving, promising or solicitation of any such payments that constitute a bribe between individuals and customers, suppliers, politicians, government advisors or officials, or any other associated third party. In addition, we will not tolerate any instances where a position or association with SIG is misused for personal gain.

It is illegal to establish accounts or internal budgets for the purposes of facilitating bribes or influencing transactions.

You must never accept any personal payments from customers, suppliers or any other third parties that may influence your business decisions.

All employees are expected to be aware of their obligations and remain vigilant in protecting the business from any risks associated with bribery or corruption.

You can find further guidance in the [Group Anti-Bribery and Corruption policy](#).

## GIFTS AND HOSPITALITY

It is our aim to always and fully comply with the law and make sure employees, business partners, suppliers and customers operate without corruption. We recognise that the exchange of social courtesies is acceptable when there is a clear business purpose and they remain aligned to our ethical standards. However, special consideration must be taken in the giving or receiving of gifts or hospitality to ensure that there is no real or perceived corruption or conflict of interest.

You should not accept excessive or substantial gifts or hospitality, and should not offer or receive any gifts, goods or favours that may amount to, or be seen as bribery or an attempt to influence someone's behaviour. Any breaches of our anti-bribery and corruption policy may be subject to disciplinary measures, up to and including dismissal from SIG.

As an international company, employees should ensure that they are aware of any local customs or practices before visiting any countries in which we operate. However, employees are expected to politely refuse any gifts or hospitality that would mean this policy is breached.

All gifts or hospitality received or offered must be authorised and declared. If in doubt as to whether you should offer or accept any form of gift or hospitality, you should contact your line manager prior to any exchanges or activity taking place.

You can find further information in our [Group Gifts and Hospitality Policy](#).

## CONFLICTS OF INTEREST

Whether actual or perceived, conflicts of interest can damage our reputation and must be avoided at all times. Actions taken by employees should be objective and made in the best interests of SIG. Conflicts of interest may include, but are not limited to:

- associating the business with individuals with whom you have a personal or professional relationship, for example employing the services of close friends or family. You should declare any instances where this may occur to your line manager or relevant director.
- accepting any job, consultancy work, appointment to another company's Board or any other form of work. You must obtain written approval from your relevant director prior to engaging in any of these activities and must declare where there is any known conflict of interest.
- undertaking private work or establishing intellectual property in the same or a similar area of business to that of SIG.

If you suspect you may have an actual or potential conflict of interest, you must raise this with your line manager immediately. You should take no part in, nor seek to influence a business decision which may result in a conflict of interest arising.

## DEALING IN SIG SHARES

Information that may affect the share price of SIG but has not been made public is known as inside information.

As part of your status as an employee, you are expected to keep any information that may affect our share price, such as financial targets or results, or any information on strategic business plans, strictly confidential. In addition, financial advice based on knowledge of such information and involving investment in the Company must not be given to friends, family or colleagues who might illegally seek to profit from that information.

It is illegal for SIG employees to buy or sell shares in SIG plc based on knowledge of inside information. Sharing such information with any unauthorised third parties is an offence and may result in civil or criminal proceedings.

If in doubt, you should contact the Group General Counsel & Company Secretary for further guidance.

## POLITICAL CONTRIBUTIONS

Contributions by, or on behalf of, SIG to any political parties or individuals linked to government or political organisations, whether in cash, goods, services or equipment, are not permitted.

## CONFIDENTIAL INFORMATION

Sensitive internal information is often known as 'trade secrets' and is defined as any information that is confidential to the business, including but not limited to commercial, strategic and business performance information. By law, any such information is the property of SIG and all employees are obliged and expected to protect its confidentiality.

Employees may be given or come into contact with trade secrets as part of carrying out the responsibilities of their role. This information must not be divulged outside of the business via any route and employees should carefully consider the content of any correspondence with external sources to make sure that nothing confidential is intentionally or inadvertently shared.

Any breaches in confidentiality may result in disciplinary proceedings up to and including dismissal from SIG.

In addition, from time to time, customers, suppliers, or third parties may divulge confidential information to you in the course of business dealings. We expect employees to uphold the same standards of confidentiality in relation to external organisations that may be associated with SIG.

## DATA PROTECTION

In order to operate efficiently, from time to time we may need to collect and use personal data about people with whom we work. These may include current, past and prospective

employees, clients, customers and suppliers. This personal information must be handled and managed properly, regardless of how it is collected, recorded and used, and in what format (for example through electronic or paper-based methods.) We are legally obliged to safeguard this information in line with relevant data protection legislation.

Our reputation relies on maintaining the trust and confidence of anyone we associate with, and we are committed to the lawful and correct treatment of personal data.

You can find further information in the [Group General Data Protection Regulation \(GDPR\) Policy](#).

## COMMUNITY AND CHARITY INVOLVEMENT

We aim to be a responsible partner within the local communities in which we operate and actively encourage the support of community initiatives and local charities. Each Operating Company is encouraged, through the Company's charitable donations process, to develop programmes and initiatives that address the needs of their local community. You should only make charitable donations that are legal and in line with our ethical standards, and any donations should be approved via the appropriate local processes.

## FURTHER GUIDANCE AND SUPPORT

If you have any questions about the content in our Code of Conduct, please see your line manager or local HR representative.