



## Scientific & Chemical Supplies Ltd.

Carlton House  
Livingstone Road  
Bilston  
West Midlands  
WV14 0QZ  
United Kingdom  
Tel: 01902 402 402  
Fax: 01902 402 343  
[www.scichem.com](http://www.scichem.com)

## Business Ethics Policy

### 1. Compliance

The company will comply fully with all relevant national and international laws and will act in accordance with local guidelines and regulations, including those which are industry specific, governing our operations.

It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the part of the business in which they are engaged, including tax and exchange controls.

Even where the law does not apply, applicable standards of ethics and morality relate to our activities and require the same diligence and attention to good conduct and citizenship. Employees must avoid situations where appearance of impropriety exists, even though the circumstances might not otherwise specifically violate this code of conduct.

### 2. Risk Assessment

The company recognises that there are risks associated with carrying out any business activity. Management is required to carry out due diligence to check the trading relationships wherever the company operates. Management is responsible both for ensuring that policies and procedures are in place to manage risks and for complying with those policies and procedures. Employees should ensure that they are aware of the risks associated with their activities and that they comply with policies and procedures in place to manage those risks.

### 3. Confidential Information

Employees must not make use of confidential information obtained through their employment for personal gain, nor disclose such information to any third party during or after their employment. 'Confidential information' is either information that has been specifically described as being confidential or is otherwise obviously confidential from the surrounding circumstances.

The term "confidential information" does not include information already in the public domain, information that was already known to the recipient at the time of its disclosure, or information that is required by law to be disclosed.

### 4. Conflicts of Interest

Sales of the company's services and products and purchases of products and services from suppliers will be made solely on the basis of quality, performance, price and value, and never on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form.





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Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the company, or which divides his or her loyalty to the company. Any activity which even appears to present such a conflict must be avoided or terminated unless, after disclosure to the appropriate level of management, it is determined that the activity is not unethical or improper, does not compromise integrity and is not detrimental to the reputation and standing of the company.

### 5. Bribery and Corruption

The company is resolutely opposed to bribery and corruption in whatever form it may take. Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are proportionate, modest in value and cannot be interpreted as inducements to trade. Where there is doubt, guidance should be sought from a director. No financial or other inducements should be given to third party organisations or to individuals from such organisations in any circumstances. This includes government agencies and representatives.

Employees should not accept gifts, money or entertainment from third party organisations or individuals, where these might reasonably be considered likely to influence business transactions. Unsolicited gifts, other than trivial ones with a low value, should be returned. In a culture where such an action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.

### 6. Accounting Standards and Records

All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with generally accepted accounting principles. No record or entry must be false, distorted, incomplete or suppressed.

### 7. External Reporting

Our business may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, timely and not misleading. Senior management must be made aware of any sensitive disclosure before it is made.

Care must also be taken when making statements to the media that information given is correct and not misleading. Enquiries from the media should be referred to the managing director and statements should only be made by designated spokespersons.

### 8. Political Contributions

The company does not make contributions to political parties.





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### 9. Employees

Our company supports the principles of the United Nations Universal Declaration of Human Rights and is committed to upholding these principles in its policies, procedures and practices. Respect for human rights is and will remain integral to our operations. We will respect freedom of association and the right to collective bargaining in accordance with local legislation and practice.

Employment will be freely chosen with no use of forced labour or child labour.

In dealing with our employees, we will act in compliance with national regulatory requirements and government guidelines. We will not discriminate on the basis of gender, colour, ethnicity, culture, religion, sexual orientation or disability.

Employees will be paid and work hours at least as favourable as the terms established by national legislation or agreements or industry standards.

We will take measures to ensure that the work of our employees does not compromise internationally accepted human rights conventions, whilst recognising and respecting the diversity in local cultures across the different countries in which we operate.

We will endeavour to ensure that we work with business partners who conduct their business in a way that is compatible with our policies of respect for human rights and ethical conduct. We will work with customers to ensure that contractual requirements do not infringe human rights.

We value all our employees for their contribution to our business and their opportunities for advancement will be equal and not influenced by considerations other than their performance, ability and aptitude.

Employers' obligations to employees under labour or social security laws and regulations must be respected. The businesses and their employees will work towards creating permanent long-term relationships. To achieve a working environment in which team spirit and commitment to our goals and values are maintained, the company will ensure that individual employees are treated fairly and with dignity and respect. They will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company.

The company places the highest priority on promoting the health and safety of employees whilst at work. In particular, it will constantly review the effectiveness of its methods of operation to best protect those who work in a high-risk environment.

In order to protect the interests of its customers and employees, and because of the nature of its business, our company will apply rigorous pre-employment screening and selection techniques.





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### 10. Customers

Mutual trust and confidence between the company and its customers is vital. All employees should strive to consistently deliver service excellence and value for money, meeting customers' expectations and anticipating their changing requirements.

### 11. Suppliers

All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to win company business.

It is the company policy to pay suppliers on time in accordance with agreed terms of trade.

In turn our company sets high standards for its suppliers in the context of their own ethical policy.

The UK Government introduced the Modern Slavery Act 2015 which requires certain businesses to produce a statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains. The organisation is currently below the threshold of an annual turnover of £36m. The company is committed to transparency in the supply chain and will raise awareness with its suppliers to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

### 12. Competitors

Our company will always compete vigorously, but in a fair and ethical way. Competitive success is built on providing good value and service excellence. Competitors should not be disparaged. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not discuss pricing strategies or undertake any arrangements which would conflict with the laws of the territory concerned.

### 13. Shareholders

The company will provide shareholders a published annual report and accounts and any other statements as appropriate to enable shareholders to assess the company performance.

### 14. Community

The company is fully committed to supporting and assisting the communities in which the company operates through a variety of means including charitable fund-raising, sponsorship of community projects and voluntary work by employees. Our company will also serve local communities by providing good employment





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opportunities and effective services and products which safeguard the public good.

### 15. Environment

We will conduct our business with respect and consideration for the communities in which we operate and for the environment. We will take steps to minimise any disturbance to communities as a result of our operations. We will strive to minimise our impact on the environment in each of our operations through reduction of waste, vehicle emissions and energy consumption.

### 16. E-mails and use of the Internet

Employees are permitted to use e-mails and the internet where appropriate for their job. Limited personal use is also permitted in an employee's own time e.g. during breaks, in accordance with local guidelines. Employees should exercise due care to ensure that the company is not committed to any inappropriate or unauthorised liability.

Employees must not use the e-mail or internet in any way which would be in breach of copyright, contracts or licence agreements. Derogatory comments about any organisation or individual must never be made. Viewing or distributing of pornographic, paedophilic or other data which could be considered offensive is expressly prohibited. Any personal views in e-mails must be clearly marked as such.

Employees should exercise due care to ensure that viruses or other harmful software are not knowingly imported or spread.

### 17. Harassment

Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving the harassment (racial, sexual or of any other kind) of any employee is unacceptable. Should an employee believe that he or she has been harassed; the matter should be raised with the relevant manager or director who will arrange for it to be investigated without delay, impartially and confidentially.

### 18. Staff Suggestions, Complaints and Whistle-Blowing

Staff can expect that the company will give due consideration to their constructive suggestions and will provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, legislation, policies and procedures.

Concerns must be investigated impartially so that the employee's rights are protected. Employees who have concerns about potential unethical behaviour should advise their manager or a director in the first instance.





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Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorised or unless it is a legal requirement.

If the whistle-blower is dissatisfied with the response to the concern raised, or if the concern relates to a matter of exceptional gravity or sensitivity, then a director, managing director or chairman should be informed immediately.

### 19. Monitoring and Review

This Business Ethics Policy must be adopted by all staff in all locations as a minimum standard. It will be monitored and reviewed as part of the overall company compliance process and at least annually at the management review.

### 20. Communication

The company will communicate the policies and procedures adopted to all staff, interested parties and to any organisation contracted to work on behalf of the company.

Philip Palser  
Chief Technology Officer

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