



Code of Conduct

This Code of Conduct forms a fundamental part of the relationships with our suppliers and our distributors

Ethics **Respect** Responsibility **Environmental**
Social Responsibilities Sustainable **Due diligence**
Integrity **Code of Conduct**
Honesty Health and Safety **Human Rights**
openness Principles **Behaviour** Moral Standards
professionalism **Compliance**
Values **Data Protection**

The Seetru Organisation

CODE OF CONDUCT

1 Introduction

The Seetru Organisation consists of Seetru Limited, Blupax Engineering and Industrial Private Ltd, and includes Seetru Engineering Services (an operating division of Seetru Limited).

All of our suppliers and distributors (“Business Partners”) must comply with this Code of Conduct. This Code of Conduct forms a fundamental part of our contractual relationships with our suppliers and distributors. Violation of this Code may result in corrective actions, suspension of work and/or termination of the business relationship. Business Partners suppliers and distributors must endeavor to ensure that subcontractors and other relevant contractual partners also comply with the provisions of this Code.

This Code sets the minimum standards Seetru expects from our Business Partners that provide goods or services to Seetru or distribute Seetru products. Business Partners must have appropriate policies, controls, and procedures to meet these standards and to comply with applicable laws and regulations in all jurisdictions in which they operate.

This Code applies to all Business Partners and, where relevant to Seetru business, to their employees, agents, subcontractors, and others performing work for or on their behalf. Business Partners are expected to communicate these requirements and apply proportionate oversight to their own supply chains (risk-based “flow-down”).

2 Social Responsibilities

Business Partners must uphold the principles of social responsibility and ethical business conduct, human rights, fair labour practices, safe and healthy workplaces, and environmental protection. In this regard our Business Partners are required to uphold the principles of the UN Global Compact.

2.1 Ethics

Business Partners shall conduct business ethically and in compliance with applicable laws. This includes, at a minimum:

- Zero tolerance for bribery, corruption, fraud, extortion or kickbacks (refer section 2.4).
- Avoidance of conflicts of interest and prompt disclosure to Seetru of any actual or potential conflict that could affect the business.
- Fair competition and compliance with applicable competition laws.
- Accurate financial records.
- Protection of Seetru confidential information and intellectual property.
- A speak-up route for employees to raise concerns without retaliation and prompt escalation to Seetru.

2.2 Modern Slavery and Human Rights

Business Partners must maintain effective controls to prevent modern slavery and human trafficking in their operations and supply chains. This includes risk-based due diligence, meaningful worker engagement, training for workers, and a victim-centered approach to remediation where abuse is identified. Business Partners must promptly notify Seetru of any credible allegation or confirmed instance of modern slavery linked to Seetru business.

Business Partners shall respect internationally recognised human rights legislation and ensure they are not complicit in human rights abuses. The following shall be complied with:

- All forms of illegal, forced or compulsory labour, slavery and servitude are prohibited.
- No individual shall be induced through force, threats, coercion, or deception to provide services or benefits of any kind.
- No individuals, groups or organisations shall be involved in the trafficking of humans.
Trafficking means recruiting, transporting, transferring, harbouring or receiving persons, or otherwise arranging or facilitating travel of any individual who is at risk of exploitation through forced or compulsory labour or slavery or servitude.
- Elimination of child labour: all workers shall have reached the minimum age required for work in the relevant authority.

- Elimination of discrimination and harassment in hiring, employment, and occupation practices.
- Compliance with applicable laws and regulations relating to working hours, rest days, safe working conditions, employee rights, and wage levels.

2.3 Bribery and Corruption

Bribery is a criminal offence. Seetru requires compliance with the highest ethical standards and all applicable international anti-bribery and anti-corruption laws. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind. At a minimum, Business Partners shall:

- Prohibit offering, giving, requesting or accepting bribes or improper advantages, whether directly or indirectly,
- Prohibit facilitation payments.
- Maintain proportionate procedures to prevent bribery, including risk assessment, due diligence on 3rd parties, training and communication, and review.
- Maintain a gifts and hospitality approach that is reasonable, transparent, and appropriately recorded, and never intended to improperly influence decisions.
- Maintain a process for reporting and investigation suspected bribery or corruption.

2.4 Financial Integrity, Prevention of Tax Evasion and Money Laundering

There must be zero tolerance towards all forms of tax evasion and/or money laundering. These shall be prohibited absolutely whether committed or facilitated by employees of the Business Partner or anyone acting on its behalf. Business Partners shall:

- Operate effective financial controls and maintain accurate records to prevent fraud and financial crime.
- Prohibit the criminal facilitation of tax evasion and maintain reasonable prevention procedures proportionate to risk.
- Prohibit money laundering and terrorist financing.
- Promptly notify Seetru of any suspected or actual financial crime linked to Seetru business.

2.5 Conflict Minerals, US Dodd-Frank Act and Supply Chain Due Diligence

Seetru seeks supply chain transparency and responsible mineral sourcing to ensure that our use of minerals does not directly or indirectly finance or benefit armed groups who perpetrate human rights abuses. Where these minerals might originate from or where processed in conflict-affected or high-risk areas, then Business Partners must use best endeavours to trace the original source of supply and confirm that the supply is not armed groups. Business Partners shall provide relevant declarations and supporting information upon request.

Minerals subject to these provisions include:

- Tin
- Tantalum
- Tungsten
- Cobalt
- Columbite-Tantalite (coltan)(source of Tantalum)
- Cassiterite (source of Tin)
- Wolframite (source of Tungsten)
- Derivative metals of the above minerals.

2.6 Health and Safety

Applicable health and safety laws and regulations (including, where relevant, duties equivalent to the UK Health and Safety at Work etc. Act 1974) must be complied with to:

- Provide and maintain a safe place of work, safe systems of work, safe equipment and healthy and safe working environment.
- Ensure that hazards are identified and regular assessment of risks are undertaken.
- Provide information, instruction, training, and supervision as necessary to ensure employees and others are assured of a safe and healthy working environment.
- Promote awareness of health and safety and encourage best practice.
- Ensure appropriate protective and preventative measures are taken.
- Ensure access to competent advice to secure compliance with statutory duties.

2.7 Environmental

All applicable legislation must be met or exceeded, and a precautionary approach to environmental risks must be taken.

Objectives required:

- Conserve energy, water and resources, minimise use of natural resources and impact on the environment.
- Reuse and recycle and where practicable, change to renewable resources.
- Adopt good practice with regard to the reduction of waste, minimise the need for treatment, disposal, or emissions.
- Use raw materials and dispose of waste in a safe environmentally acceptable manner.

2.8 Sustainable Procurement

Sustainable Procurement is about meeting business needs today without adversely affecting the ability of others in the future to meet their needs. Business Partners must support ethical supply chains and continual improvement in environmental and social performance, including where practice the deliberate inclusion of public interest into decision making and the “triple bottom line”: People, Planet and Profit.

3 Counterfeit, Fraudulent and Suspect Items

Only genuine original equipment manufacturer (OEM) products shall be used and/or supplied. Business Partners must implement controls to prevent, detect, and report counterfeit, fraudulent or suspect items (including parts, materials, certificates, and documentation). Business Partners shall:

- Source materials and components only from approved and traceable sources.
- Maintain appropriate traceability records and provide them to Seetru upon request.
- Immediately notify Seetru if counterfeit, fraudulent, or suspect items are identified.
- Support containment and investigation activities.

4 Information Security & Data Protection

Policies and practices shall be in place so as assure information security and business continuity. Business Partners must protect Seetru information and systems that they access by ensuring secure configurations and access controls and in the case of suspected cyber security incident, promptly notify Seetru.

All applicable data protection regulations must be complied with. Confidential business data relating to the business of Seetru must be kept secure and not used or disclosed to 3rd parties without prior consent. Where personal data is processed for or on behalf of Seetru, Business Partners must apply appropriate technical and organisational measures to ensure security and lawful processing.

5 Due Diligence, Compliance & Reporting

Due diligence must be undertaken in all aspects of the business execution to ensure discharge of all responsibilities, legal and regulatory responsibilities as well as moral and commercial responsibilities. Due diligence should be risk-based and proportionate to the nature of the goods and/or services and the geographies and supply chains involved.

Monitoring and reporting processes must be operated to ensure continual compliance with the requirements of this Code. Right to audit (including on-site audits):

- Seetru and/or its appointed representatives have the right to conduct on-site audits and assessments of Business Partner facilities, processes, and relevant records, with reasonable notice, proportionate to risk, and subject to appropriate health, safety, and confidentiality requirements.
- Audits may include reviews of documents, management interviews, employee interviews (where lawful), site inspections, and traceability verification.
- Business Partners must provide reasonable access and cooperate with audit activities and implement corrective actions within agreed times.

6 Reporting Concerns

Seetru encourage 3rd parties to promptly report concerns of misconduct, violations of the law, and other ethical behaviors by emailing compliance@seetru.com or in writing addressed to:

Head of Quality, Compliance & Sustainability

Seetru Limited

Albion Dockside Works

Hanover Place

Bristol

BS1 6UT

United Kingdom

7 Compliance Declaration

We, the Business Partner as undersigned, hereby confirm that we have received and taken due note of the contents of this Code of Conduct:

- We will notify Seetru when any business activities may be in violation of this Code.
- We will inform our subcontractors of the content of this Code.

Company Name: _____

Signature: _____

Name: _____

Position: _____

Date: _____

Please return completed document to:

compliance@seetru.com