

## 2. Ethical Behaviour Policy

### Introduction

DPE interfaces with customers and suppliers. These groups, together with other organisations and individuals with which our businesses interact, take an interest in what we do. Their opinions about DPE are influenced by our actions. A good reputation is not just important, it is essential to our ongoing success. A key determinant of this reputation is how we all behave – both as individuals and collectively.

In a complex world, it is impractical to set specific rules and regulations to cover every situation. However, we at DPE do have a Code of Business Ethics which seeks to offer clear standards and guidance for the business dealings of every employee. It outlines the standards that we must all attain and covers a range of different areas of activity. Whilst it cannot deal with every circumstance, it creates a framework to help us decide how to behave. The Code is designed to help set our interactions with colleagues, external stakeholders and the communities in which we work on strong ethical foundations. Our objective is to protect the reputation of our company and to protect the interests of every employee by ensuring individual legal and regulatory compliance as well as responsible behaviour.

Supporting the Code are specific policies. These are available on the Intranet and set out in more detail how we should conduct our business. They underline the important message that behaving responsibly, and ethically, is an integral part of all of our jobs. As such it is the personal responsibility of each one of us, as well as an important duty of line management to monitor compliance. The Directors and management of DPE endorse and support the Code.

To ensure that each one of us is fully aware of what the Code requires and understands its implications, we expect all employees to participate in appropriate training. If you are ever in any doubt about how to behave in specific situations or wish to report what might be a violation of the Code, talk to your immediate line management. We undertake that anyone raising a concern in good faith may do so without fear of victimisation or negative consequences.

In conclusion it is vitally important that DPE can be seen to be responsible and ethical participants in the markets in which we operate. I ask for the commitment of every employee to uphold the Code and to contribute towards the success of a great company.

### Code of Business Ethics

Our Code applies to all employees of DPE. Compliance with our Code helps to sustain and enhance the good reputation of the Company. We believe that every employee plays their part in building and strengthening the company as a whole. 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**

DPE, its employees and agents, are required, as a minimum standard, to comply with all laws and regulations of the country.

### **We Compete Fairly**

DPE believes in competing fairly and vigorously in its market sectors. DPE 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**

DPE expects its employees to act with integrity at all times to safeguard the trust in which DPE is held by its customers, suppliers and other individuals and organisations with which our businesses interact.

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 DPE, or which might compromise their ability to meet the responsibilities of their job.

DPE does not offer, promise, give, demand or accept bribes or other unethical advantage in order to obtain, retain or give business or other advantage.

DPE employees who have access to privileged, proprietary or confidential information (whether belonging to DPE or others) must not share, divulge or make known in any form what so ever to any individual, organisation, company or body that does not have the specific rights to this information or use it to achieve personal gain for themselves or others.

DPE employees must ensure proper and responsible use of all DPE's assets, including physical property, intangible assets, and IT equipment and communication resources.

### **We Treat our Suppliers, Partners and Customers Properly**

DPE suppliers are paid promptly within agreed terms of business.

DPE seeks to provide its customers with products, 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.

DPE believes in working in partnership with its suppliers, so as to meet the expectations of DPE customers, and to ensure quality, value and timeliness throughout the supply chain.

DPE 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.

DPE expects agents, suppliers, Sub-contractors 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**

DPE recruits, selects, and promotes employees on the basis of their qualifications, skills, aptitude and attitude.

In employment related decisions, DPE complies with anti-discrimination requirements concerning matters of race, colour, national origin, gender, marital status, sexual orientation, religious belief, age or physical or mental disability.

All DPE employees shall be treated with respect and dignity. Accordingly, any harassment or bullying is unacceptable.

DPE 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**

DPE is committed to conducting all its activities in a manner which achieves the highest practicable standards of health and safety.

DPE seeks to protect its employees, physical assets, information and reputation from potential security threats.

### **We Respect the Environment**

DPE is committed to ensuring that it minimises, as far as reasonably practicable, any detrimental effects of its activities or products upon the environment.

### **We Respect Human Rights**

DPE seeks to uphold all internationally recognised human rights.

DPE 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**

DPE records all business transactions accurately, prudently and transparently, in compliance with the accounting policies as detailed in the DPE Annual Report & Accounts and in accordance with best practice.

Comprehensive assessment and management of risk, together with strong systems of internal control, are essential aspects of DPE structure and serve to ensure that it is managed effectively and that reported results are accurate.

An Internal Audit function monitors and reports to the Board of David Paull Engineering Ltd on the effectiveness of internal controls and on the ongoing risk management process for identifying, evaluating and managing significant business risk.

### **The Code Applies to Everyone**

Our Code applies throughout DPE to all its employees. It is available both on the intranet and in hard copy. Disregard or breach of the Code by an employee may result in disciplinary action.

Our Code is not intended to replace existing policies of DPE but serves as a governing document to which other policies must adhere.

Where DPE is a participant in any joint venture or commercial sharing arrangement, DPE seeks, as far as practicable, to ensure that the combined vehicle complies with our Code.

DPE 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 a number of routes:

- Speak to a member of the management team.
- If you wish to raise the issue outside your immediate working environment contact any Director

All reports are treated confidentially and investigated properly and promptly.