



BUSINESS ETHICS POLICY

Including: Bribery and Corruption, Equality and Diversity, Conflict Minerals, Slavery & Human Trafficking

At Bristol Metal Spraying & Protective Coatings we strive to provide quality products and services and are continually seeking to deliver the best results for the company and the most beneficial service to our customers.

Ethical conduct is defined as that which is morally correct and honourable. To maintain Bristol Metal Spraying & Protective Coating's valuable reputation, and to build on our success, we will conduct our business in a manner which is both legal and ethical.

This Business Ethics Policy establishes Bristol Metal Spraying & Protective Coating's commitment to following ethical practices and fundamental principles of ethical business behaviour. The directors and management team at Bristol Metal Spraying & Protective Coatings will promote compliance by example and by providing guidance to other employees.

Ethics and Business Conduct

All employees contribute to Bristol Metal Spraying & Protective Coating's reputation and are expected to adhere to ethical guidelines.

Compliance with laws

Bristol Metal Spraying & Protective Coating's business will be conducted in compliance with all applicable law. All employees will be made aware of the legal requirements that apply to their role within Bristol Metal Spraying & Protective Coatings. Bristol Metal Spraying & Protective Coatings will not tolerate illegal activity conducted for personal gain or on the company's behalf.

Honesty and integrity

All employees will consider Bristol Metal Spraying & Protective Coating's reputation and credibility, be honest and respectable in all dealings with other employees, the public, the business community, customers, suppliers, competitors and government authorities.

Conflict of Interest Bribery and Other Misconduct

All Bristol Metal Spraying & Protective Coatings employees are expected to act in the best interests of the Company alone. Employees will avoid any activities or situations where personal interests are, or appear to be, in competition with or in opposition to Bristol Metal Spraying & Protective Coating's interests. This includes:

- 1) Competing business interests
- 2) Insider Trading
- 3) Use of employment activities for personal gain
- 4) Misuse of Company property or resources
- 5) Personal transactions with Bristol Metal Spraying & Protective Coatings business associates

Bribery and Corruption

Bristol Metal Spraying & Protective Coatings has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all its business dealings and relationships, implementing and enforcing effective systems to counter bribery.

International Business

Bristol Metal Spraying & Protective Coatings employees will comply with all applicable local laws as well as all UK law.

Corporate Information and Confidentiality

The scope of information considered confidential at Bristol Metal Spraying & Protective Coatings is quoted but not limited to:

- Technical information/drawings
- Financial data
- Work process information
- Price lists
- Business plans and intentions
- Legal matters
- Applications for patents and trademarks
- Software developments
- Commercial and technical information received on a confidential basis from third parties such as suppliers or customers
- Operation methods

All employees are expected to treat confidential information as such, by not revealing it to anyone, either while employed at Bristol Metal Spraying & Protective Coatings or after they leave the company, unless they have written authorisation from a Director.

Corporate Communications

All public communications made by or on behalf of Bristol Metal Spraying & Protective Coatings shall be full, fair, accurate, timely and understandable.

Employment Practices including Equality and Diversity

Bristol Metal Spraying & Protective Coatings strives to provide a positive work environment that supports productivity, dignity and self-esteem, and the pursuit of personal goals. Our employment policies and procedures provide for equal opportunity and fairness in employment decisions. All information on this is contained in the Bristol Metal Spraying & Protective Coatings Employee Handbook.

Equality and Diversity

Bristol Metal Spraying & Protective Coatings is committed to promoting equality and diversity in all its activities to promote inclusive processes, practices and culture.

- We will strive to work to eliminate any unlawful or unfair discrimination including direct or indirect discrimination, discrimination by association, discrimination linked to a perceived characteristic, harassment and victimisation.
- We will remain proactive in taking steps to ensure inclusion and engagement for all the people who work for and with us.
- We will continue to strive towards a culture that is diverse and inclusive that recognises and develops the potential of all staff.
- We recognise the business benefits and opportunities of having a diverse community of staff who value one another and the contribution they can make.

Health and Safety

Bristol Metal Spraying & Protective Coatings is committed to protecting the health and Safety of all employees.

We have adopted policies and procedures that are aimed at ensuring Bristol Metal Spraying & Protective Coatings meet all applicable health and safety law and regulations. We strive to fully implement all safety policies and procedures.

Environment

At Bristol Metal Spraying & Protective Coatings we endeavour to meet all regulatory standards by implementing appropriate measures for the assessment of potential environmental effects, for the prevention of these potential effects and for appropriate response to any incidents that might occur.

Whistle blower Policy and Procedure

Bristol Metal Spraying & Protective Coatings provides a procedure for the confidential and anonymous reporting of issues in relation to questionable or fraudulent activities including (but not limited to) accounting and auditing actions by employees of the company. This policy and procedure can be found in the employee handbook, which is available from a member of the Human Resources team.

Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Bristol Metal Spraying & Protective Coatings have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Conflict Minerals

Bristol Metal Spraying & Protective Coatings is committed to ensuring that the products it sells do not incorporate "conflict minerals," which are minerals smelted into tin, tantalum, tungsten and gold sourced from entities which directly or indirectly finance conflict in the Democratic Republic of Congo or adjoining countries.

Compliance

Bristol Metal Spraying & Protective Coatings have adopted this business ethics policy, and we trust that all employees at all levels will use their best judgment to ensure they comply with its principles. The Management team are responsible for overseeing compliance with this Ethics Policy.

Employee Communication

Bristol Metal Spraying & Protective Coatings will provide employees with the opportunity to become familiar with the Ethics Policy and related policies and procedures. We will communicate the contents of this Ethics Policy and provide on-going opportunity for employees to ask questions and seek additional information.

Reporting

To implement the Ethics Policy Bristol Metal Spraying & Protective Coatings need full cooperation of all employees. We expect employees to comply with all aspects of this ethics policy and encourage employees to report any violations they observe to any member of the Management team.

Violation

The Management team will investigate all reports or other information received regarding alleged violations of this Ethics Policy, and will report to a Director on the results of the investigations of material violations. Any person, who is found to have violated this Ethics Policy, or any related policy, will be subject to disciplinary action which is detailed in the employee handbook.

D.Nelmes (Director)

Dated: 11th December 2019