

Code of Conduct

Welcome to Detectortesters and thank you for choosing us!

BUSINESS ETHICS

It is our policy to conduct all our business in an honest, transparent and ethical manner. This statement governs all our business dealings and the conduct of all persons or organisations who are appointed to act on our behalf including, but not limited to, all staff including managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term employees, casual and agency staff. This Code of Conduct describes our vision and values and the standards of conduct that we require from all persons and organisations appointed to act on our behalf. Breaches of this Code of Conduct will be dealt with in accordance with our internal Disciplinary Procedure.

MISSION, VISION AND VALUES

We have developed a mission statement, vision and set of values that we believe are key to our business and to those who work here.

Our Mission: "PIONEERING THE WORLD OF TESTING TECHNOLOGY"

Our Vision: To provide innovative, connected solutions that protect people's lives and property. We are committed to delivering excellence and making life safer, simpler and easier for our customers.

Our Values: With our pioneering mission in mind, our values have developed around the word **SPIRIT** with each letter representing a core Value.

1. FAIR COMPETITION

We take a zero-tolerance approach to anti-competitive behaviour including, but not limited to, price-fixing, sharing market or customers, sharing commercially sensitive information and abuse of dominant position.

2. ANTI-BRIBERY AND CORRUPTION

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships in line with our Anti-Bribery and Corruption Policy available on our website and our internal Environmental extended Quality Management System.

3. ANTI-MONEY LAUNDERING (AML)

We take a zero-tolerance approach to money laundering and financial crime throughout the business, wherever it may take place in the world. The company's senior management have overall responsibility for the implementation and monitoring of this policy. The Company will uphold legislation for countering money laundering, including The Proceeds of Crime Act 2002 (as amended by the Crime and Courts Act 2013 and the Serious Crime Act 2015), the Terrorism Act 2000 (as amended by the Anti-Terrorism, Crime and Security Act 2001), Counter-Terrorism Act 2008 Schedule 7, and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, HM Treasury Sanctions Notices and News Releases, now incorporated in the Money Laundering Regulations 2017 and the Criminal Finances Act 2017. Further detail of our AML Policy is available in our internal Environmental integrated Quality Management System.

4. ANTI-FACILITATION OF TAX EVASION

We take a zero-tolerance approach to all forms of facilitation of tax evasion as per the Criminal Financial Act 2017, whether under UK law or under the law of any foreign country. All persons associated with Detectortesters shall not undertake any transaction which cause the Company to commit a tax evasion offence or facilitate a tax evasion offence by a third party who is not an associate of the Company. The company's senior management have overall responsibility for the implementation and monitoring of this policy.

5. EQUAL OPPORTUNITIES AND ANTI-HARASSMENT

Detectortesters is committed to providing a working environment free from any sort of harassment, bullying and unlawful discrimination by ensuring all employees are treated, and treat others, with dignity and respect. Further detail on our anti-harassment and bullying policy as well as our equal opportunity policy can be found in our internal Employee Handbook.

6. WHISTLEBLOWING

Our whistleblowing policy provides a mechanism for reporting, investigating and remedying any wrongdoing in the workplace. Any suspected wrongdoing should be reported as soon as possible. We aim to encourage openness and will support whistle blowers who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistle blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform our Whistle blowing Officer immediately at whistleblowing@detectortesters.com. Public Concern at Work (independent whistleblowing charity) operates a confidential helpline. Their contact details are available at www.protect-advice.org.uk.

7. INFORMATION SECURITY AND DATA PROTECTION

During the course of our activities, the Company will process sensitive data (which may be held on paper or electronically) about any relevant interested parties and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 2018 (DPA) and GDPR. We will ensure that appropriate measures are taken against unlawful or unauthorised processing of sensitive data and against the accidental loss or damage to sensitive data. We have in place procedures and technologies to maintain the security of all data from the point of collection to the point of destruction. Further detail on our data protection policy can be found in our internal Employee Handbook.

8. HEALTH AND SAFETY

Health and Safety is everyone's responsibility and Detectortesters is committed "to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees and wider interested parties and to provide communication, training and supervision as needed for this purpose." Further details of our H&S policy are available on our website, our internal Employee Handbook and our internal Environmental extended Quality Management System.

9. ENVIRONMENTAL

We are committed "to manage and monitor the environmental impacts related to the use of materials and their associated waste, the emission of greenhouse gases directly from our business and from our supply chain." Further details of our Environmental Policy are available on our website and our ISO 14001 certified Environmental integrated Quality Management System.

10. EQUITY, DIVERSITY AND INCLUSION (EDI)

It is our priority to create an inclusive workplace that is committed to celebrating and promoting equity, diversity and inclusion practices. The aim is for our workforce to be a fair representation of all sections of society and for every person to feel respected and able to give their best. Further detail on our EDI policy can be found in our internal Employee Handbook.

11. SOCIAL RESPONSIBILITY

We recognise that investing in our community means investing in the future of our business. Giving back to the community we live and work is just the right thing to do! We encourage our employees, in line with our ESG framework, to participate to charitable giving activities and events organised by the Company.

12. HUMAN RIGHTS

We take a zero-tolerance approach to slavery and human trafficking in any part of our business relationships, including our supply chain and contractors. Our Modern Slavery and Human Trafficking Policy, available on our website and our internal Environmental extended Quality Management System, sets out our commitments in accordance with the Modern Slavery Act 2015 and the Universal Declaration of Human Rights.

13. CONFLICT OF INTEREST

In general terms, a conflict of interest exists when an organisation or an individual has competing interests which might impair its or their ability to make objective and unbiased decisions. All persons or organisations who are appointed to act on Detectortesters' behalf, engaged in any activity with a potential, perceived or actual conflict of interest are advised to contact the direct manager and/or the Head of People for assistance in assessing the risk and identifying an appropriate course of actions. Further detail on conflict of interest can be found in our internal Employee Handbook.

We provide inductions and periodic training to our employees in relation to the policies set out and referenced in this Code of Conduct. This document is subject to monitoring and review on a regular basis and in accordance to changes to internal policies and legislations.



Robert Campbell
Chief Executive Officer