

Corporate Responsibility and Sustainability

At tpgroup, we take pride in our global reputation for providing specialist services and engineering solutions in a manner that never compromises our integrity or our high standards of business conduct. We take seriously our responsibility to behave in a manner which is both responsible and ethical. This code applies to all officers, employees, workers, contractors and all those representing tpgroup (including its subsidiaries) in any capacity.

1 Equality of opportunity

- We create an environment where individuals are treated with dignity and respect, in line with our duty to provide equal opportunities to all.
- We respect human rights and do not directly or indirectly discriminate between persons based on reasons of race, creed, sex, gender, sexual orientation, social status, religion, nationality, pregnancy, age or bodily or mental disability.
- We respect the cultures, customs and history of every country with which we are brought into contact with.

2 Healthy work environment

- We respect one another and make every effort to ensure that the work environment, whether in the office, workshop or other location where work is carried out, is an open and comfortable environment.
- No one should disturb the sound discipline, environment and good order of the work environment by conduct, such as sexual harassment, which is contrary to public order and good moral standards.
- We do not tolerate any forms of bullying. For the avoidance of doubt, bullying involves any offensive, intimidating or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened.
- If someone's actions in the work environment are offensive and hostile, we encourage others to speak up without fear so that we can remedy the situation quickly and sensitively.

3 Service standards to clients/customers

- We listen with sincerity to the opinions of customers and shall reflect upon them in the carrying out of business affairs in the future.

- We shall provide customers with accurate information (proper labelling and representation) relating to products, services, etc. in order to fulfil customer reassurance and satisfaction.

4 Compliance with Anti-Corruption Law

- In our business dealings we never act in a manner which results in an illegal restraint of trade, such as collusion in tender or collusion with a view to the fixing of price levels or levels of production or supply or the division of markets.
- We never conduct unfair trade practices, such as boycott, resale price maintenance or payment of unjustified rebates.
- We do not unreasonably damage the interests of sub-contractors.

5 Anti-Bribery, gift and favour

- We take a zero-tolerance approach to bribery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate.
- We conduct ourselves in an ethical and responsible manner in the communities in which we work. In particular, we do not:
 - render public officials or persons in a similar position any economic favour such as money, gift or other favour in return for performance of their duties.
 - pay any agent, advisor or consultant any commission which they have reason to know will be used for influencing public officials or persons in a similar position in an unlawful manner.
 - render employees or officers of customers any economic favour such as money, gift or other favour, the value of which is greater than a generally accepted commercial level, nor receive such economic favour from employees or officers of customers.

6 Conflicts of interest

- Our business judgement is free from bias, conflicts of interest or undue influence of others. Any situation that might interfere with our ability to perform our jobs effectively, or even create an appearance of bias, should be avoided. In particular, employees should not:
 - participate in any activity or association which creates or appears to create a conflict between his or her personal interest and tpgroup's business interest.
 - use tpgroup's property, assets or information system for any purpose other than that of tpgroup's business.

7 Treatment of confidential information

- We strive to protect those who have placed their trust in us. We therefore conduct our business with transparency and honesty. As such, employees should:

- hold any secret information of tpgroup as strictly confidential and should not divulge such information to any third party, nor should they use the same for any purpose other than that of the business of tpgroup.
- not infringe the intellectual property rights of any third party, including the copying of computer software, without express permission of such third party.
- timely disclose any information of tpgroup in accordance with any laws and regulations protecting the interests of investors including the rules of any relevant stock exchanges.
- If employees become acquainted with any information of the tpgroup or its customers which may materially influence the judgment of investors in the tpgroup or in such customers, they should not sell or purchase any stock of tpgroup or stock of such customers unless and until such information becomes public and in any event employees should comply with all relevant insider dealing laws including but not limited to the Market Abuse Regulations 2016.
- We understand the importance of ensuring the privacy, security and appropriate handling of the data of and relating to employees, customers and suppliers, including all personal data and we ensure that this is managed effectively through policies, procedures, education and audits throughout our businesses. Preparation for compliance with the 2016/679 General Data Protection Regulation started in August 2016 to ensure we are fully prepared for its introduction in May 2018.
- Government agencies rely on the accuracy of the records we hold. As such, employees should:
 - make accurate and timely accounting reports and should not make any false or misleading entries in the company's books and records.
 - not use the assets or funds of the company for any unlawful purpose, nor should they establish or maintain undisclosed or unrecorded assets or funds.

No modern slavery

- Modern slavery takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which involve a violation of fundamental human rights by another in order to exploit them for personal or commercial gain.
- We take a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. As such, employees:
 - are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.
 - if they believe or suspect a breach of this policy has occurred or that it may occur they must notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible.

Protection of the environment

- We comply with all laws and regulations concerning the protection of the environment and make every effort to be informed and aware of environmental issues concerning tpgroup and its business.
- All business undertaken by tpgroup should be conducted in accordance with the laws and regulations concerning the protection of the environment and every effort should be made to try to ensure, so far as reasonably possible, that tpgroup's business does not cause damage to the environment, and the relevant employees should always conduct an environmental assessment to ensure that this is the case.

Report and sanction

- If an employee finds evidence of violation of these guidelines, he or she should inform the business immediately. Employees should cooperate in any investigation of such alleged violation.
- If, as a result of the investigation, it becomes clear that there was a violation of the guidelines, sanctions will be imposed on the violator (and possibly on his or her superiors) in accordance with the regulations of tpgroup in force from time to time.
- The persons concerned with the investigation of such alleged violation should make every effort to prevent such informant and other employees who cooperate in such investigation from suffering any disadvantage.