



Ethical Code of Conduct Policy

GENERAL STATEMENT

Fireclad Ltd. HarrisonJorge Ltd. & Custom Crafted Ltd. (the Company) is committed to ethical business behaviour at all times, in every respect of the management and operation of our business.

As part of this commitment, the Company will not tolerate any action or omission by any employee, or any other person or organisation acting on the Company's behalf, that could, by any reasonable interpretation, be considered unethical or fraudulent, or could be viewed as malpractice, either commercially or morally. An example of such corrupt behaviour, would be bribery, or the giving and receiving of gifts, where these are clearly offered and received in an atmosphere whereby a promise related to business dealings is offered in return for such a gift. This would not be the only type of behaviour that might be considered as corrupt.

Our directors are ultimately responsible for fulfilling this commitment.

We will take appropriate steps to ensure that our statutory duties are met at all times e.g. in particular, but not exclusively, with regard to the UK Acts, UK Regulations, and relevant EC Directives, relating to employment, health, safety and welfare, environmental, and accountancy practices.

We consider that this commitment also encompasses our responsibility for protecting other persons and organisations, with whom we are associated, from any harm that could result from any breach of this policy.

It is the duty of our directors, with the support of the management team, to ensure that adequate resources are made available to ensure our statutory obligations are continuously fulfilled, and that all management and administration practices, processes, procedures, systems and documentation, are designed to remove, or minimise, the temptation to take 'short-cuts', or to engage in other acts e.g. offering, accepting or soliciting bribery, or other corrupt practices that could in any way reflect badly upon our business and our customers.

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Each employee and person otherwise engaged by our Company, will be given such information, instructions, and training, as is necessary to enable their full understanding of, and compliance with, this policy.

Adequate facilities and arrangements will be maintained within our employment practices, to encourage 'whistle-blowing' i.e. to allow employees, or their representatives, to raise issues such as suspected or identified breaches of this policy.

The successful implementation of this policy, requires total commitment and co-operation from, and between, all levels of employee and contracted personnel, working for the Company. Every individual, has a legal obligation to act within relevant UK and European law and, as such, to act responsibly for their own sake, and for the sake of their colleagues and other persons outside of the Company, with whom we interact.

This policy will be regularly monitored, to ensure that the objectives are achieved. It will be reviewed and, if necessary, revised in the light of legislative or organisational changes.

We have a separate Corporate Social Responsibility Policy (POL-CSR), in which we set out our general approach to business ethics, within our supply chain. We also have a separate employee handbook, in which we specify the types of behaviour that we consider unacceptable i.e. grounds for disciplinary actions under gross misconduct.

Our 'Fraud and Malpractice Response Plan', is detailed below.

FRAUD & MALPRACTICE RESPONSE PLAN

Fireclad Ltd. HarrisonJorge Ltd. & Custom Crafted Ltd. (the Company) will, in the event of there being an instance of fraud, malpractice, or other breach of the Company's Ethical Code of Conduct Policy, that has involved a company employee, put the following response, or the appropriate element(s) of it, into action:

Immediately on receiving a report of, or directly identifying an instance of, fraud, malpractice, or other breach of the Company's Ethical Code of Conduct Policy, the managing director will consider whether the matter should be subject to criminal investigation and, if so, will immediately notify the Police.

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Whether or not considered a matter for the Police to investigate, the construction director and financial director will (unless advised that it would be prejudicial to a Police investigation) initiate an internal investigation, following, where appropriate, the disciplinary and, if relevant, the grievance procedures set out in the Company's Terms and Conditions of Employment.

In the case of an employee being placed under suspicion because of a matter reported by a customer, then the employee concerned will, if required by the customer, be temporarily suspended from working at the relevant site(s), until the matter has been appropriately investigated. The outcome of the investigation will then determine the next step to take, in terms of placement of the employee, at relevant sites.

Signed:

Date: 4th February 2019

David Flynn
Managing Director

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