CODE OF ETHICS POLICY

At SpliceGroup Europe Limited ("SpliceGroup"), we are proud to conduct our business activities in an ethical and socially responsible way. This Code of Ethics Policy serves to provide guidance and information on our business ethics and how to do the right thing, when working for or on behalf of the Company.

This Policy applies to all staff who work for and on behalf of SpliceGroup, (including officers, directors, managers, team leaders, employees, temporary, agency, interim, sub-contractor or consultant staff), and includes other organisations who do business with us.

Purpose

In any business, ethical behaviour is expected from all employees and at SpliceGroup the example is set by our Board of Directors and Senior Management Team.
Internally, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication.

At SpliceGroup, the success of our business is dependent on the trust and confidence we earn from all our stakeholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honourable conduct.

We all deserve to work in an environment where we are treated with dignity and respect. SpliceGroup is committed to creating such an environment because it brings out the full potential in each of us, which in turn, contributes directly to our business success.

Principles and Ethics:

Integrity

Integrity, fairness and honesty are the foundations on which our business is built. It means people can believe what we say as a business, and act appropriately with value and commitment. We do not tolerate dishonesty, fraud, misconduct or deliberate wrongdoing and we expect everyone to act in a way that maintains the trust and confidence of our colleagues, customers, suppliers and other stakeholders.

Respect for others

We believe an effective workplace can only exist when employees are fully committed to treating one another with respect. Be kind, polite and understanding. Respect others' personal space, opinions and privacy. We will not tolerate harassment or victimisation of others. All staff are expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behaviour that could be taken as offensive, intimidating, humiliating, malicious or insulting – See POL07 Diversity & Inclusion Policy for further information.

Teamwork

We encourage all employees to work together and bring fresh and purposeful ideas to the company, which allows for a synchronised and trusted working relationship across all platforms.

Excellence

Producing the results within each role in our business builds the trusted and reliant business our employees wish to work for, and our customers want to trade with. We encourage every employee to deliver their best and to take accountability for results.

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Our Responsibilities:

Conflict of Interest

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. A "conflict of interest" exists when an employee's personal interest (that can be linked to friends, family, or customer, competitor, supplier, contractor entity) interferes or potentially interferes with the best interests of the business. Any employee with doubts about whether conduct is or could be construed as a conflict of interest, should speak to their manager before taking action.

Privacy and Personal Data

We respect people's privacy and we acknowledge that customers, employees and all stakeholders need to feel confident their personal data is processed appropriately and for a legitimate business purpose. We are committed to complying with all General Data Protection Regulations (GDPR).

Health, Safety and Environmental Sustainablilty

SpliceGroup take our responsibilities for ensuring a healthy and safe work environment seriously and encourage all staff to take accountability too. We measure and evaluate the environmental impact of our business activities and are committed to actions to restore and preserve the environment. We aim to communicate openly about our challenges and achievements in this area.

Compliance with Law and Regulations

SpliceGroup Europe Limited are committed to complying with all applicable laws, regulations and regulatory requirements and expect everyone to follow the policies and procedures relevant to their role. This Code should be read alongside Splice's other Policies, which provide detailed guidance on specific areas of ethical and professional conduct. These include :

POL03 Health & Safety Policy
POL04 Anti-Bribery Policy
POL07 Inclusion, Diversity & Equal Opportunities Policy
POL18 Modern Slavery Policy Statement
POL23 GDPR Data Protection Employment Policy
POL26 Corporate Criminal Offence Policy
POL27 Prevention of Sexual Harrassment in the Workplace Policy

Speaking Up and Raising Concerns

We encourage everyone to speak up if they have a concern about behaviour or actions that may be unethical, unlawful, unsafe or inconsistent with this Code of Ethics, or our Policies. We all have a responsibility to raise concerns when something does not feel right, and to do so honestly and in good faith. You should not ignore or conceal wrongdoing and you should seek advice if you are unsure about the appropriate course of action. Our POL11 Whistleblowing Policy provides further guidance on reporting concerns and the protections available to those who raise them.

Andrew Varley
General Manager