



Policy document

Code of Ethics

APPROVAL

The signatures below certify that this Policy has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Malcolm Cameron		Head of Commercial	01/05/21
Reviewed by	Matt Rothnie		Head of QHSES	01/05/21
Approved by	David Clark		Chief Executive Officer	01/05/21

AMENDMENT RECORD

This Policy is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of change and/or contextual additions or omissions is given below:

Page No.	Context	Revision	Date
	First issue	0	01/05/21

COMPANY PROPRIETARY INFORMATION

The electronic version of this Policy is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this manual is uncontrolled, except when provided with a document reference number and revision.

At Vysus Group our Code of Ethics helps us to ensure that we do things safely, ethically and responsibly. Its role is to make sure that everyone who works for or with a member of the Vysus Group understands that unlawful or unethical business practices will not be tolerated. Our Values – Trust, Partnership and Passion – are the shared beliefs that guide decision making at Vysus Group.

As a Minimum

At Vysus Group, we will always aim to act in accordance with the laws of the countries in which we operate but this Code of Ethics highlights our Standards that ensure that we continually reach beyond simply fulfilling these minimum requirements and obligations.

Our Mandate

Vysus Group's Ethics & Compliance Committee has a mandate to ensure that the Code of Ethics and supporting Standards and practices within the Vysus Group are compliant with industry best practice in all of the territories in which we operate. The Ethics & Compliance Committee also supports the Vysus Group brand and safeguards and upholds the principles of the Vysus Group Board.

Ownership and Overview

The Ethics & Compliance Committee has ownership and maintains an overview of the full range of related Standards and activities:

Anti-Bribery, Anti-Corruption and Fraud – This Standard sets out our responsibilities, and of those working for us, in observing and upholding our zero-tolerance position on bribery, corruption and fraud; and provides information and guidance to those working for us on how to recognise and avoid and report suspicions of bribery, corruption and fraud;

Speaking Out – Which seeks to ensure that all employees and contractors are able to raise serious concerns, which they believe indicate malpractice or wrongdoing within Vysus Group, without fear of being dismissed or otherwise disciplined or jeopardising their position;

Conflict of Interest – The Standard states the requirements to ensure that employees and others acting on behalf of the Vysus Group are free from conflicts of interest which could adversely influence their judgement, objectivity or loyalty in conducting business activities, and which could compromise our independence, impartiality and integrity; and

Environmental & Social Governance – Our Environmental & Social Governance policy strives to achieve a sustainable, ethical balance between society, environment and economic matters. It compliments and strengthens our independence, integrity and innovation.

All suspected incidents of malpractice or wrongdoing must be reported using the dedicated email ethics@vysusgroup.com. That email should also be used where further guidance is needed on any ethical issue facing Vysus Group or where a decision is required of the Ethics & Compliance Committee.

David Clark, Chief Executive Officer Dated: DD MM 20XX

Vysus Group Holding Limited.