



## **Proficio Limited Code of Ethics Policy**

This policy outlines the Company's ethical stance towards carrying out business and helps to communicate this to all employees of the Company.

This policy is applied in conjunction with the Company's anti-bribery policy and the current employee handbook.

### **Definition**

Ethical considerations affect the Company's treatment and stance towards all employees, suppliers and customers.

The Company has principles and ideals that it follows and upholds in all its interactions, whether internal or external. The Company ensures through its management and employees that it adheres to these principles.

### **Our ethical stance**

It is the policy of Proficio Limited to conduct its business at all times and throughout the world with honesty and integrity. All employees will be provided with a copy of this Code and will be expected to conduct themselves in accordance with it. Management have been deputed to monitor compliance and to report any significant breach to the Company Secretary or any Company Director.

In case of uncertainty in interpretation, employees should seek clarification from their line managers. All employees have the right to make confidential reports direct to the Company Secretary of Proficio Limited without fear of discriminatory action being taken against them.

In particular:

- We will comply with the law in each country in which we do business including laws relating to unfair competition/anti-trust.
- We will not offer to pay, solicit or accept bribes in any form whether directly or indirectly. This includes payment or receipt of “facilitation payments” which are small payments or gifts made as common practice in some countries to obtain approvals, permits etc more speedily – they are still bribes.
- We will only give or receive gifts and entertainment that are not material or regular. Local management in each country will establish guidelines reflecting local custom as to the maximum permitted value and the circumstances in which such gifts and entertainment are acceptable.
- We will record in our published accounts all material assets and liabilities and not maintain secret accounts.
- We will not make political donations anywhere in the world.
- We will not engage in commercial espionage or covert surveillance of our competitors.

Any deliberate failures to comply with, or decisions to deliberately deviate from, the ethical principles of the Company may trigger the need for disciplinary action to be taken.

### **Induction**

During the standard Company induction, the Company’s ethical stance is communicated to all employees. Responsibility for the provision of the induction programme rests with the line manager for the employee.

### **Training**

To ensure that existing employees continue to understand and apply the principles of the Company’s ethical stance, laid out above, the HR department carry out periodic training sessions to ensure employees understand the ethical positions taken by the Company on a wide range of subjects and areas and can apply these when carrying out their role.

### **Interactions with third parties, customers and suppliers**

The key touch points outside the Company should be governed by the ethical guidelines laid out above, as set out during induction and re-emphasised in training. Customer interactions should always apply the Company’s ethics practices, as should all dealings with suppliers and other third parties.

### **Product development**

Internal research and development of new Company products or services will take place in accordance with the Company’s ethical guidelines.

**Communication**

Any communication carried out by employees on behalf of the Company or in order to carry out their job role must apply the Company's ethical stance, as set out above.

A handwritten signature in black ink, appearing to read 'Mark Semple', written in a cursive style.

Mark Semple, MD  
01/02/2023