

## **Business Conduct Policy**

### **1. Introduction**

The BSS Group plc constantly seeks to improve profitability through consistent customer satisfaction, by maintaining the highest standards of safety, environmental performance, reliability, quality of service and by investing in the development of an enthusiastic and professional team.

We strive to protect and increase the value of our shareholders' investment and to create long-term benefits for all the stakeholders in our business.

All employees are required to comply with this policy on social, environmental and ethical behaviour.

This policy has the support of the Board and the Executive.

### **2. Overview**

We aim to:

- § Conduct all our business with honesty and integrity and are a responsible member of the community
- § Perform all our activities to the highest standards of quality
- § Provide outstanding value in customer service and develop lasting, profitable and innovative partnerships with our customers and suppliers
- § Provide our employees with a safe working environment, free of discrimination and intimidation and in which employees are treated fairly and reasonably

### **3. Environment**

We focus on minimising the use of energy, waste packaging, water consumption and emissions as well as ensuring that our products are safe and wherever possible, provide the most efficient solutions for heating and pipeline process in terms of protecting the environment

We seek opportunities to minimise waste produced in all sections of the business, and use and supply products containing on optimum proportion of recycled materials and resources.

We encourage and provide relevant training to staff aimed at developing a culture which recognises the importance of a healthy environment.

We comply with all relevant environmental legislation, regulations, standards and other relevant codes.

We work in partnership with our suppliers to work towards ensuring effective environmental supply chain management and to promote sustainable sourcing of products and materials.

In order to reduce our carbon footprint we constantly review and manage our transport supply chain including the use of energy efficient vehicles utilising alternative energies.

#### **4. Quality**

It is our policy to provide a quality service to our customers and to meet the contractual requirements of their orders.

We are committed to good practice throughout the business

We continually seek to improve all aspect of our business through agreeing forward thinking stocking and distribution to the benefit of our customers.

All systems and procedures in BSS Industrial are BS EN ISO 9002 compliant

#### **5. Health and Safety**

We recognise that complying with the Health & Safety at Work Act 1974 is a legal requirement, not a matter of choice. To provide a safe working environment for our employees and visitors is of crucial importance to us. The Board is immediately updated on accidents or near misses and each incident is discussed in depth at the following board meeting.

We develop, maintain and improve the organisations' ability to eliminate and/or control risks to Health & Safety, to exceed expectations of employees, shareholders, customers and suppliers and to satisfy legal requirements.

We ensure that systems are in place, which allow us to assess, maintain, monitor and where necessary, improve safety performance and encourage a culture of a safe working environment.

In return, employees are expected to exceed their legal duties and to co-operate with us on all safety matters and to take care of their own safety and that of others.

#### **6. Commercial**

Our customers and suppliers will be dealt with the highest level of integrity and we are committed to high standards of governance and to conducting our business lawfully and ethically.

Employees will not seek to obtain improper advantage by offering inappropriate items of value, outside the accepted bounds of business hospitality and courtesy.

Employees will not accept directly or indirectly anything of value where receipt might appear to influence their decision in relation to doing business with any particular person or organisation.

Individual employment contracts may detail obligations with regard to confidentiality and conflict of interest, but as a general rule employees are expected to disclose to their manager any circumstances which may involve a conflict of interests. In addition employees must respect the confidentiality of sensitive business information to which they have access and not divulge this outside the Company.

## **7. Social**

Compliance is sought at all times with such matters as Equal Opportunities, Data Protection, Diversity in Employment, Public Disclosure and Health & Safety.

The Company is committed to providing equal opportunities and to avoiding unlawful discrimination in respect of all employees and all individuals who come into contact with the Company.

We aim to maintain a progressive equal opportunities policy to ensure equal treatment for all of us, irrespective of race, creed, colour, nationality, ethnic origin, age, language, religion, staff category, political or other opinion, affiliation, gender, gender reassignment, sexual orientation, marital or parental status, membership or non-membership of trade union or unless justifiable, disability.

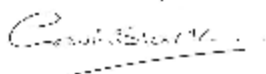
Individuals are trained, developed, promoted and treated on the basis of their relevant aptitudes, abilities and skills.

We recognise that everyone is different and by valuing diversity we appreciate that people with different experiences, views, opinions and approaches can bring important skills to the Company.

Where possible we support our employees seeking to balance the responsibilities of their home and work lives through flexible working.

All dealings with employees will reflect a respect for basic human rights and will avoid exploitation of susceptible groups. We will not employ underage staff, or illegal immigrants or any form of forced or involuntary labour. We will also work with our suppliers to ensure that the products we supply are not subject to any such exploitation.

We seek to develop and maintain a culture of openness whereby all employees are able to raise freely, in confidence and without retribution genuine concerns that they may have about suspected malpractice within the Company.



**Gavin Slark**  
**Group Chief Executive**

14 January 2010

Approved by the BSS board on 29 March 2007  
Reissued January 2010