



# Ethical Policy Statement

## Policy

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| Authorisation Record | Written by             | Reviewed by     | Authorised by     |
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| <b>Document No.</b>  | <b>Revision</b>        |                 | <b>Date</b>       |
| IMS-PS-04-598        | 2.0                    |                 | October 2016      |

## Ethical Policy Statement

A reputation for integrity has been a cornerstone of Responsive Engineering Limited's (REL) business since its foundation. It gives customers the confidence that the company's products meet the standards claimed for them and that they may safely entrust their own materials to REL for processing and safe keeping. Employees at all levels are required to protect REL's reputation for integrity.

REL strive to maintain the highest standards of ethical conduct and corporate responsibility worldwide through the application of the following principles;

- Compliance with application laws and regulations is required as a minimum standard.
- Reputable business practices must be applied worldwide
- Protection of customer intellectual Property at all times
- Excluding the use of counterfeit materials
- Conflicts of interest must be declared and appropriate arrangements made to ensure that those with a material interest are not involved in the decision making process
- Improper payments of any kind are prohibited, similarly no gift whose value is material and which may be interpreted as a form of inducement should be accepted or offered by REL employees
- Reporting of business performance should be undertaken in such a way that senior management is fully and properly informed concerning the business' true performance, risks and opportunities in a timely manner
- Ethical issues must be dealt with in an efficient and transparent manner
- A positive contribution to society as a whole, and specifically the communities in which we operate, must be ensured
- We must seek to influence our suppliers to operate to similar high standards as ourselves

We support the principles set out within the United Nations Universal Declaration of Human Rights and International Labour Organisation Core Conventions.

REL endeavour to ensure natural resources used within our manufacturing portfolio are 3TG conflict free relating to the conflict minerals requirements passed by US congress.

All employees have a duty to follow the principles set out in this policy statement. It is the responsibility of directors and senior management to ensure that all employees who directly or indirectly report to them are fully aware of REL's policies and values in the conduct of the company's businesses. It is also the responsibility of directors and senior management to lead by example and to demonstrate the highest standards of integrity on carrying out their duties on behalf of the company.

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**Material Composition**

REL are committed to supply products to its Customers which have a material composition that complies with all applicable Directives, Regulations and Laws. This requirement applies to all levels of REL's Supply Chain.

By accepting a Purchase Order from REL, Suppliers accept full liability to comply with the following Regulations and Directives. It is the duty of all REL Suppliers to declare whether they are in breach of any of these Regulations and Directives, or have an exemption, restriction or authorisation (including reference numbers where applicable).

**Restriction and Use of Certain Hazardous Substances (RoHS) Directive 2011/65/EU** and any future editions and amendments – The restriction of the use of certain hazardous substances in electrical and electronic equipment has been enforced to limit the usage of hazardous substances.

**Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulations (EC) 1907/2006** and any future amendments obligates article producers to inform their customers if their articles (products) contain any of the substances of very high concern (SVHC) listed by the European Chemicals Agency (ECHA), at concentrations greater than 0.1% (weight/weight), and whether their particular use has been authorised.

**Biocidal Regulations (EC) 528/2012** and any future editions and amendments – making available on the market and use of biocidal products. Biocidal products should neither be made available on the market nor used unless authorised in accordance with this Regulation.

**Conflict Minerals** – The Foreign & Commonwealth Office (Import and Export Controls) are encouraging British companies trading in minerals from the Democratic Republic of Congo to be socially, economically and environmentally responsible.

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**Appendix 1. Amendment Record**

| <b>Rev. No.</b> | <b>Date</b> | <b>Detail</b>                        | <b>Authorised</b> |
|-----------------|-------------|--------------------------------------|-------------------|
| 0.1             | Mar '15     | First Issue                          | DL                |
| 1.0             | May '16     | System re-issue, no material change. | DL                |
| 2.0             | Oct '16     | Material Compositions update.        | DL                |
|                 |             |                                      |                   |
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