

Corporate Code of Conduct

Organisation	TP Group Plc and its subsidiaries
Title	Corporate Code of Conduct
Creator	Group Legal and Compliance Director
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Unknown	Group Legal & Compliance Director	1.0	First Issue
03/04/18	Group Legal & Compliance Director	2.0	Incorporation of Core Values
26/07/19	Group Legal & Compliance Director	3.0	Armed Forces Covenant & Disability Confidential sections
23/09/19	Group Legal & Compliance Director	3.1	Template Update

At TP Group, we take pride in our global reputation for providing specialist services and engineering solutions in a manner that never compromises our integrity or our high standards of business conduct. We take seriously our responsibility to behave in a manner which is both responsible and ethical and have appropriate policies, working practices and procedures in place to be compliant with the 8 Core Conventions of the International Organisation.

This Code of Conduct applies to all officers, employees, workers, contractors and all those representing TP Group (including its subsidiaries) in any capacity.

1 Company Core Values

TP Group's Core Values run to the core of everything we do and drive business, social and ethical behaviours. The TP Group Core Values are:

- Achieve together - thrive on knowledge sharing, helping each other and delivering projects as a team.
- Embrace responsibility - take responsibility for our own work. Trust our people to deliver their projects and have ownership in what they do.
- Strive for excellence - constantly strive to achieve the highest standards in our work.

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- Build unity - work cohesively with our colleagues, customers and partners to build strong and lasting relationships.
- Challenge ourselves - challenge ourselves and our people to develop and grow. To learn new things and to always seek to improve what we do.
- Have integrity in all we do - always conduct our business fairly, with honesty and transparency.

2 Corporate Governance Code

TP Group has adopted the QCA Corporate Governance Code. Full details of this, including our current level of compliance, can be found on our website at [www.tpgroup.uk.com/investors/aim rule 26](http://www.tpgroup.uk.com/investors/aim%20rule%2026)

3 Equality of Opportunity

- We create an environment where individuals are treated with dignity and respect, in line with our duty to provide equal opportunities to all.
- We respect human rights and do not directly or indirectly discriminate between persons based on reasons of race, creed, sex, gender, sexual orientation, social status, religion, nationality, pregnancy, age or bodily or mental disability.
- We respect the cultures, customs and history of every country with which we are brought into contact with.

4 Healthy Work Environment

- We respect one another and make every effort to ensure that the work environment, whether in the office, workshop or other location where work is carried out, is an open and comfortable environment.
- The business does not accept conduct, such as sexual harassment, which is contrary to public order and good moral standards.
- We do not tolerate any forms of bullying. For the avoidance of doubt, bullying involves any offensive, intimidating or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened.
- If someone's actions in the work environment are offensive and hostile, we encourage others to speak up without fear so that we can remedy the situation quickly and sensitively.

5 Service Standards to Clients/Customers

- We listen with sincerity to the opinions of customers and shall reflect upon them in the carrying out of business affairs in the future.
- We shall provide customers with accurate information relating to products, services, etc. in order to fulfil customer reassurance and satisfaction.

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6 Compliance with Anti-Corruption Law

- In our business dealings we never act in a manner which results in an illegal restraint of trade, such as collusion in tender or collusion with a view to the fixing of price levels or levels of production or supply or the division of markets.
- We never conduct unfair trade practices, such as boycott, resale price maintenance or payment of unjustified rebates.
- We do not unreasonably damage the interests of sub-contractors.

7 Anti-Bribery, Gift and Favour

- We take a zero-tolerance approach to bribery and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.
- We conduct ourselves in an ethical and responsible manner in the communities in which we work. In particular, we do not:
 - render public officials or persons in a similar position any economic favour such as money, gift or other favour in return for performance of their duties.
 - pay any agent, advisor or consultant any commission which we have reason to know will be used for influencing public officials or persons in a similar position in an unlawful manner.
 - render employees or officers of customers any economic favour such as money, gift or other favour, the value of which is greater than a generally accepted commercial level, nor receive such economic favour from employees or officers of customers.

8 Conflicts of Interest

- Our business judgement is free from bias, conflicts of interest or undue influence of others. Any situation that might interfere with our ability to perform our jobs effectively, or even create an appearance of bias, should be avoided. In particular, employees should not:
 - participate in any activity or association which creates or appears to create a conflict between his or her personal interest and TP Group's business interest.
 - use TP Group's property, assets or information system for any purpose other than that of TP Group's business.

9 Treatment of Confidential Information

- We strive to protect those who have placed their trust in us. We therefore conduct our business with transparency and honesty. As such, employees should:
 - not have any secret information of TP Group as strictly confidential and

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should not divulge such information to any third party, nor should they use the same for any purpose other than that of the business of TP Group.

- not infringe the intellectual property rights of any third party, including the copying of computer software, without express permission of such third party.
- timely disclose any information of TP Group in accordance with any laws and regulations protecting the interests of investors including the rules of any relevant stock exchanges.
- If employees become acquainted with any information of the TP Group or its customers, which may materially influence the judgment of investors in the TP Group or in such customers, they should not sell or purchase any stock of TP Group or stock of such customers unless and until such information becomes public and in any event employees should comply with all relevant insider dealing laws including but not limited to the **Market Abuse Regulations 2016**.
- We understand the importance of ensuring the privacy, security and appropriate handling of the data of and relating to employees, customers, stakeholders and suppliers, including all personal data and we ensure that this is managed effectively through policies, procedures, education and audits throughout our businesses. Preparation for compliance with the 2016/679 General Data Protection Regulation started in August 2016 to ensure were fully prepared for its introduction in May 2018.
- Government agencies rely on the accuracy of the records we hold. As such, employees should:
 - make accurate and timely accounting reports and should not make any false or misleading entries in the company's books and records.
 - not use the assets or funds of the company for any unlawful purpose, nor should they establish or maintain undisclosed or unrecorded assets or funds.

10 Armed Forces Covenant

- Our **Reservist Policy** now matches our pledge with the Armed Forces Covenant. Since these changes were made, the TP Group pledge is now a registered employer with the Armed Forces Covenant. This means that we seek to uphold the principles of the Armed Forces Covenant, by:
 - promoting the fact that we are an armed forces-friendly organisation;
 - seeking to support the employment of veterans young and old and working with the Career Transition Partnership (CTP), in order to establish a tailored employment pathway for Service Leavers;
 - striving to support the employment of Service spouses and partners;
 - endeavouring to offer a degree of flexibility in granting leave for Service spouses and partners before, during and after a partner's deployment;

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- seeking to support our employees who choose to be members of the Reserve forces, including by accommodating their training through paid leave and deployment where possible;
- offering support to our local cadet units, either in our local community or in local schools, where possible;
- aiming to actively participate in Armed Forces Day;

11 No Modern Slavery

- Modern slavery takes various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which involve a violation of fundamental human rights by another in order to exploit them for personal or commercial gain.
- We take a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. As such, employees:
 - are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest possible stage.
 - if they believe or suspect a breach of this policy has occurred or may occur they must notify their manager or report it as soon as possible in accordance with our **Whistleblowing Policy**.

12 Disability Confident

- TP Group is proud to have signed up to the Disability Confident initiative, which supports businesses in Disability Confident organisations play a leading role in changing attitudes for the better.
- The scheme helps employers recruit and retain great people, and draw from the widest possible pool of talent
- secure high quality staff who are skilled, loyal and hard working
- improve employee morale and commitment by demonstrating that you treat all employees fairly

It also helps customers and other businesses identify those employers who are committed to equality in the workplace.

13 Protection of the Environment

- We comply with all laws and regulations concerning the protection of the environment and make every effort to be informed and aware of environmental issues concerning TP Group and its business.
- All business undertaken by TP Group, should be conducted in accordance with the laws and regulations concerning the protection of the environment. Every effort should be made to try to ensure, so far as reasonably possible, that TP Group's business does not cause damage to the environment, and the relevant employees should always conduct an environmental assessment to ensure that this is the case.

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14 Report and Sanction

- If an employee finds evidence of violation of these guidelines, he or she should inform the business immediately in line with the Whistleblowing Policy. Employees should cooperate in any investigation of such alleged violation.
- If, as a result of the investigation, it becomes clear that there was a violation of the guidelines, sanctions will be imposed on the violator (and possibly on his or her superiors) in accordance with the regulations of TP Group in force from time to time.
- The persons concerned with the investigation of such alleged violation should make every effort to prevent such informant and other employees who cooperate in such investigation from suffering any disadvantage.

References

Reservist Policy

Whistleblowing Policy