

Morvern Group Limited

Business Code of Conduct

1. Purpose

At Morvern Group Limited, we are committed to maintaining the highest standards of integrity and ethical conduct. This Business Code of Conduct outlines the principles and standards that guide our business operations and interactions with employees, customers, suppliers, and other stakeholders. The purpose of this Code of Conduct is to:

- Establish clear expectations for ethical behaviour and decision-making.
- Promote a culture of integrity, accountability, and transparency.
- Ensure compliance with applicable laws and regulations.

2. Scope

This Code of Conduct applies to all employees, officers, directors, agents, consultants, contractors, and any other third-party representatives of Morvern Group Limited. It covers all aspects of our business operations and interactions.

3. Core Values

Morvern Group Limited will at all times strive to uphold the following values:

- **Integrity:** Act with honesty and integrity in all business dealings.
- **Respect:** Treat everyone with respect and dignity.
- **Accountability:** Take responsibility for our actions and decisions.
- **Excellence:** Strive for excellence in all that we do.
- **Sustainability:** Conduct business in an environmentally and socially responsible manner.

4. Legal and Regulatory Compliance

Morvern Group Limited will at all times strive to uphold the following values:

- **Compliance with Laws:** Adhere to all applicable laws, regulations, and industry standards in the countries in which we operate.
- **Anti-Corruption:** Prohibit all forms of bribery and corruption. Do not offer, give, solicit, or accept any form of bribe or kickback.
- **Fair Competition:** Compete fairly and ethically. Do not engage in anti-competitive practices or abuse market power.

5. Ethical Business Practices

Morvern Group Limited will conduct business in an ethical fashion and will at all times observe the following principles:

- **Conflicts of Interest:** Avoid any activities or relationships that could create a conflict of interest or the appearance of a conflict. Disclose any potential conflicts to management.
- **Confidentiality:** Protect confidential information and do not disclose it to unauthorised parties. Respect the privacy of personal data.
- **Accurate Records:** Maintain accurate and complete business records. Ensure that all financial and operational records reflect the true nature of transactions.
- **Gifts and Hospitality:** Only offer or accept gifts and hospitality that are reasonable, proportionate, and in line with company policies. Avoid any that could influence, or appear to influence, business decisions.

6. Respect and Inclusion

Morvern Group Limited opposes all forms of discrimination and will:

- **Non-Discrimination:** Provide equal opportunities and not tolerate discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, or any other protected characteristic.
- **Harassment:** Maintain a workplace free from harassment, bullying, and any other forms of abusive behaviour.
- **Diversity and Inclusion:** Promote a diverse and inclusive workplace where everyone feels valued and respected.

7. Health and Safety

Morvern Group Limited is fully committed to maintaining safe and healthy working conditions including:

- **Safe Workplace:** Providing a safe and healthy working environment. Follow all safety procedures and report any hazards or incidents promptly.
- **Employee Wellbeing:** Supporting the physical and mental wellbeing of employees through appropriate policies and programs.

8. Environmental Responsibility

Morvern Group Limited is committed to protecting the environment and minimising the impact of its operations on the natural world and will:

- **Sustainability:** Minimise our environmental impact by reducing waste, conserving energy, and using resources efficiently.
- **Compliance:** Adhere to all environmental laws and regulations. Promote sustainable practices within our operations and supply chain.

9. Reporting and Accountability

- **Reporting Violations:** Encourage employees to report any suspected violations of this Code of Conduct or any unethical behaviour. Provide confidential reporting mechanisms (whistleblow@morverngroup.com).
- **Non-Retaliation:** Protect whistleblowers from retaliation. Ensure that reports of misconduct are taken seriously and investigated promptly and fairly.
- **Consequences:** Understand that violations of this Code of Conduct may result in disciplinary action, including termination of employment or business relationships.

10. Conclusion

Morvern Group Limited is dedicated to conducting business with integrity and in accordance with the highest ethical standards. By adhering to this Business Code of Conduct, we aim to build trust and maintain the respect of our employees, customers, suppliers, and the communities in which we operate.

By order of the Board,
Jason Steen

Chairman of the Board
Morvern Group Limited