

CORROSIONEERING GROUP CODE OF ETHICS

It is the policy of Corrosioneering Group, and the Corrocoat companies through which it operates, to conduct its business at all times and throughout the world with honesty and integrity.

The Company believes that the ethics demonstrated by our employees should give customers, suppliers, colleagues, business partners, and regulators confidence that the Company operates in a way that avoids any suggestion of improper or personal motives or actions.

All employees are expected to conduct themselves in accordance with this Code at all times, which promotes and upholds the following high standards:

- We will comply with the law in each country in which we do business including laws relating to unfair competition and anti-trust.
- We will not offer to pay, solicit or accept bribes in any form whether directly or indirectly.
- We will only give or receive gifts and entertainment that are not material or regular.
- We will not tolerate or engage in “modern slavery”, human trafficking, or employment of illegal labour of any kind.

Licensees and distributors in countries where Corrocoat does not have a controlling interest are expected to comply with this Code in all matters in which they are acting on Corrocoat’s behalf. Local management is expected to monitor compliance and to report any significant breach to the Company Secretary of Corrosioneering Group Limited. In case of uncertainty in interpretation, employees should seek clarification from a Director.

All employees have the right to make confidential reports directly to the Company Secretary of Corrosioneering Group Limited at Corrocoat, Forster Street, Leeds, LS10 1PW, United Kingdom, without fear of detrimental action being taken against them.

This Code will be applied in the same fair and consistent way to all employees and in accordance with all other relevant policy documents.

The following policies form part of this Code of Ethics:

- Anti-Bribery Policy
- Policy on “Modern Slavery”, Human Trafficking, and Employment Procedures

Failure to adhere to this Code may result in disciplinary action.

CORROCOAT ANTI-BRIBERY POLICY

A Introduction

ANTI-BRIBERY POLICY SUMMARY

Bribery has no place in Corrocoat and never will do. It is contrary to everything for which we stand as a business.

This policy applies to everyone who works for or with Corrocoat in the UK, as well as anyone who supplies services for or on our behalf. It is irrelevant whether you personally are based in the UK or overseas. If you deal with or work for, or on behalf of Corrocoat UK, then this policy applies to you.

It is essential that you read, understand and comply with this policy. Not knowing what the policy says or the law provides is not an excuse or defence.

Anyone who is involved with bribery is committing a serious criminal offence under UK law. If we conclude that someone who works for or with us, or is associated with us, has been involved in bribery then it is likely to have serious consequences, which may include the involvement of law enforcement bodies and the immediate termination of your employment or relationship with Corrocoat without notice or compensation.

B Policy Aim and Objective

The purpose of this policy is to:

- Set out Corrocoat's anti-bribery stance
- Show how we will maintain that stance
- Help to create an anti-bribery culture

The policy forms part of our procedures that are designed to prevent persons working for or associated with Corrocoat from undertaking or being involved with bribery.

C To Whom This Policy Applies

This policy applies to all of our directors, officers, managers, employees, agency workers, consultants and contractors. In short, if you work for Corrocoat or do business on behalf of or with Corrocoat, you must comply with this policy.

Whether you personally are based in the UK or overseas doesn't matter – what matters is whether you are working for, on behalf of or with Corrocoat UK or performing services for or on our behalf, wherever those services are performed.

D Our Anti-Bribery Stance

Corrocoat is committed to a way of doing business that not only meets legal requirements but also promotes responsible and ethical conduct and fosters a culture of honesty and accountability.

Key elements of this commitment are that every one of our staff or representatives should:

- Act with integrity, honesty and candour (whilst maintaining confidentiality of Corrocoat information)
- Observe both the form and spirit of the law, government rules and regulations, accounting standards, and company policies – both in the UK and the countries in which they are based
- Adhere to high standards of business ethics. This includes competing fairly and honestly and beating our competition because our products and services are better and more cost-effective rather than by using unethical or illegal business practices.

Bribery has no place within Corrocoat and is contrary to this policy and our Code of Ethics. We have a zero tolerance attitude towards bribery.

E Our Anti-Bribery Standards

You must:

- Not offer, promise or give a bribe to anyone else
- Not request, agree to receive or accept a bribe from anyone
- Not solicit or try to win business for Corrocoat (or get better terms for Corrocoat) by offering, promising or giving a bribe to anyone else
- Not give or offer business from Corrocoat (or offer better terms from Corrocoat) to anyone in return for a bribe
- Not do anything which gives, or is likely to give, the impression that a bribe has been offered, authorised, given, requested or accepted
- Not disclose information to anyone in return for a bribe
- Refuse a bribe offered by anyone and do so in a manner that is not open to misunderstanding or could give rise to false expectation
- Perform the functions and activities of your job or responsibilities properly i.e. in good faith, impartially, in accordance with your duty of trust, and as you would reasonably be expected to perform it.
- Report any attempt by anyone to bribe you or request a bribe
- Ensure that anyone who works for or with you is aware of this policy and monitor their compliance with it

F What to Do if You Suspect Bribery

If you are concerned that you have, or may have, been offered a bribe or that bribery may be taking place anywhere in the organisation, it is essential that you tell us immediately.

This is best done by reporting the matter to a director, which will be treated in strict confidence. However, if you prefer, you may make a confidential, anonymous report to the Finance Director or CEO.

So long as you raise your concern in good faith (whether it turns out that you were right to be worried or not), there will be no adverse repercussions for you. We do not want any member of staff, agent, licensee or distributor to worry that if they say something that it might be held against them. It will not be. On the contrary, we expect you to raise concerns if you have any.

G Our Zero Tolerance Policy

Corrocoat will not under any circumstances tolerate or accept bribery taking place in its business dealings. All allegations of bribery will be investigated. Any member of staff who is found guilty of bribery or being bribed would have committed a very serious disciplinary offence which is likely to result in instant dismissal without compensation.

We reserve the right to report any allegation or finding of bribery to the relevant law enforcement bodies in the UK and/or overseas.

H Status and monitoring of this Policy

We will monitor the application of this policy. We reserve the right to amend the policy in any way, at any time, and for any reason, without prior notice.

CORROCOAT POLICY ON “MODERN SLAVERY”, HUMAN TRAFFICKING, AND EMPLOYMENT OF ILLEGAL LABOUR

POLICY SUMMARY

“Modern Slavery”, Human Trafficking, and Employment of Illegal Labour have no place in Corrocoat and never will do. It is contrary to everything for which we stand as a business.

This policy applies to everyone who works for or with Corrocoat in the UK, as well as anyone who supplies services for or on our behalf. It is irrelevant whether you personally are based in the UK or overseas. If you deal with or work for, or on behalf of Corrocoat UK, then this policy applies to you.

It is essential that you read, understand and comply with this policy. Not knowing what the policy says or the law provides is not an excuse or defence.

Anyone who is involved with modern slavery, human trafficking, or employment of illegal labour is committing a serious criminal offence. If we conclude that someone who works for or with us, or is associated with us, has been involved in any of these practices then it is likely to have serious consequences, which may include the involvement of law enforcement bodies and the immediate termination of your employment or relationship with Corrocoat without notice or compensation.

A Introduction

This policy sets out Corrocoat’s stance and policy on “modern slavery”, human trafficking, and employment of illegal labour.

B Scope

This policy applies to all of our directors, officers, managers, employees, agency workers, consultants and contractors. In short, if you work for Corrocoat or do business on behalf of or with Corrocoat, you must comply with this policy.

Whether you personally are based in the UK or overseas doesn’t matter – what matters is whether you are working for, on behalf of or with Corrocoat UK or performing services for or on our behalf, wherever those services are performed.

C Policy

“Modern slavery” is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have

in common the deprivation of a person's liberty in order to exploit them for personal or commercial gain.

Corrocoat is committed to behaving ethically and with integrity in all our business dealings and has a zero tolerance approach to modern slavery.

We also have a responsibility to ensure that we employ only those who are legally entitled to work for Corrocoat. This normally involves verifying the eligibility of job applicants to live and work in the relevant country and are of working age. The regulations vary from country to country but verification will normally include:

- Proof of identity and age;
- Evidence of the right to live and work in the country in question;
- Depending on the job role, a job applicant may be asked to give disclosure of any criminal records that are not spent.

D What to Do if You Suspect Modern Slavery, Human Trafficking, or Illegal Employment

If you are concerned that modern slavery, human trafficking, or employment of illegal labour may be taking place anywhere in the organisation, it is essential that you tell us immediately.

This is best done by reporting the matter to a director, which will be treated in strict confidence. However, if you prefer, you may make a confidential, anonymous report to the Finance Director or CEO.

So long as you raise your concern in good faith (whether it turns out that you were right to be worried or not), there will be no adverse repercussions for you. We do not want any member of staff, agent, licensee or distributor to worry that if they say something that it might be held against them. It will not be. On the contrary, we expect you to raise concerns if you have any.

E Our Zero Tolerance Policy

Corrocoat will not under any circumstances tolerate engagement in or any association with modern slavery, human trafficking, or employment of illegal labour. All allegations of such practices will be investigated. Any member of staff who is found guilty of or being involved with such practices would have committed a very serious criminal and disciplinary offence which is likely to result in instant dismissal without compensation.

We reserve the right to report any allegation or finding of modern slavery, human trafficking, or employment of illegal labour to the relevant law enforcement bodies in the UK and/or overseas.

F Status and monitoring of this Policy

We will monitor the application of this policy. We reserve the right to amend the policy in any way, at any time, and for any reason, without prior notice.