



CODE OF ETHICS

Employee/Subcontractor and Suppliers

INTRODUCTION

Maynards Services Limited (referred to as MSL) value the fact that all the operations of the Company are characterised by honesty, transparency, integrity and fair play.

As a Employee, Subcontractor or supplier you should read and comprehend the content in Maynards Code of Ethics and comply with it in all your business dealings with the Company. All business carried out with or on behalf of Maynards should always be conducted in accordance with the Company Code of Ethics and follow related laws and regulation in the country of business.

ZERO TOLERANCE - BRIBERY AND CORRUPTION

MSL has a zero-tolerance policy on bribery and corruption. This applies to all the Company's business dealings and transactions. The Company does not tolerate bribery in any form and commits to strong anti-bribery systems, including this Code of Ethics. The Company is determined to ensure that the objectives of this Code are fulfilled. The Company will therefore further instruct and monitor employee as well as subcontractors and suppliers to guarantee their compliance with this Code.

Under this Code of Ethics, a bribe includes financial or other advantages which are given, promised, offered, accepted, requested or received with the intention that a specific activity should be performed.

As an employee, subcontractor or supplier of MSL, you must not be involved in any actions involving bribes when you act in connection with the MSL business. This includes both domestic and commercial business and it should be incorporated in all dealings, both with private subjects and with public officials. Facilitation payments are not permitted when acting for or on behalf of the Company.

Whether an action constitutes a bribe is determined by the standards set forth herein or elsewhere in MSL policies.

ADVANTAGE

It is MSL policy to prevent its employees from requesting, accepting, arranging, offering or giving any kind of advantage. MSL particularly wish to point out that the Company does not take any commission from suppliers. Should any of the Company's employees, openly or implied, ask for a commission of any kind, the supplier shall immediately inform MSL.

In the conduct of Company business it is a violation of MSL Code of Ethics if a subcontractor/supplier offers any kind of advantage to a Company employee. The term 'advantage' may include – but is not limited to – the following: gift, loan, money (regardless currency), fees, reward, journeys, services, bonuses, exclusive meals, vouchers of any kind, product samples for personal use, event tickets, discount on private purchases ,sponsoring, or any kind of personal favours.

It does not matter whether the person to whom the advantage is offered, promised or given is the same person as the one who is to perform or has performed the relevant action. Further it does not matter whether the advantage is given directly or by a third party, the recipient is in breach of this Code regardless of the fact that he or she receives the advantage directly or through a third party or if another person is the genuine beneficent.



As a subcontractor or supplier, you should also be aware that Maynards does not allow the offer or receipt of hospitality whenever such arrangements could affect the outcome of business transactions i.e. the purpose is to obtain or retain business with Maynards.

CONFIDENTIAL INFORMATION

A employee, subcontractor or supplier of MSL must never disclose confidential information to any person outside or within the Company, except to persons to whom disclosure is necessary for the purpose of the contract with MSL, or with a prior permission from the Company.

Confidential information includes, but is not limited to; MSL financial or commercial relationships, trade secrets, buying, offers, strategies, all supplier related information,

IT solutions, analyses and sensitive personnel data, information concerning MSL and/or the business carried on within MSL and which is not in the public domain.

Signing this document is a confirmation of your undertaking to not disclose any confidential information.

COMPLIANCE

All MSL employee's, subcontractors or supplier's should read and comprehend the content in MSL Code of Ethics and comply with all policies and procedures mentioned in the Code of Ethics.

All MSL subcontractors or supplier's have the responsibility to inform their employees, subsidiary and subcontractors about the content in MSL Code of Ethics and to secure their compliance.

A deliberate violation of the MSL Code of Ethics will lead to termination of all employment and business connections with the Company.

Since most sections of MSL: Code of Ethics follow the law in the UK where the Company operates, any deliberate violation of the Code may be a criminal act. A criminal act under the law may result in prosecution.

Subcontractors and Suppliers

If you, your employees, subsidiary, subcontractors or any other representatives of your company have questions concerning the meaning or application of MSL Code of Ethics, please contact Code of Ethics Support: **carole.maynard@maynardservices.co.uk**

MSL is committed to continuously reviewing and updating its policies and procedures, therefore this Code of Ethics can be subject to modification. The employee, subcontractor or supplier/ is responsible for keeping himself informed of the contents of such documents.

The latest version of this Code is available at MSL offices. Please sign the compliance commitment on the last page of this Code of Ethics and return it to the Company, indicating that you have received, read, understand and agree to comply with the MSL Code of Ethics.



MAYNARDS SERVICES LIMITED CODE OF ETHICS COMPLIANCE COMMITMENT

We hereby confirm that we have received, read and understand the content of Maynards Code of Ethics.

Subcontractors and Suppliers

We commit to comply with MSL Code of Ethics, take the responsibility to inform all our employees, subcontractors and subsidiary about the content in MSL Code of Ethics and to make sure they comply with the Code accordingly.

If we, or any representative of my company, subsidiary or subcontractors, have questions concerning the meaning or application of MSL Code of Ethics, or any other MSL policy, we know that we should contact the Company, knowing that our questions or reports to these sources will be maintained in confidence.

Date_____

Name of Employee/Subcontractor/Supplier (please ring where applicable)

Position_____ (Suppliers only)

Signature _____