

Business Code of Conduct | 24 May 2019

Hutchison Technologies Ltd incorporates the principles of fairness, accountability, responsibility and transparency into every aspect of our Business Code of Conduct. These principles apply to our dealings with employees, customers, and other stakeholders at every level of our business.

The following information is intended as a reference point but it is not exhaustive and is liable to change as corporate social responsibilities evolve.

Hutchison Technologies Ltd promotes fair working practices across our businesses. Our Business Code of Conduct outlines the principles and practices that we pledge to uphold in all of our operations. This includes a supplier framework, environmental policy, health & safety policy and an employment framework, supported by a Modern Slavery Statement.

1.0 Supplier Framework

When we undertake operations within our global supply chain on behalf of our customers, we understand that our customers rely on us to ensure that responsible practices are being upheld. Our Business Code of Conduct represents our commitment to only enter into business with global suppliers, vendors and contractors who incorporate the provisions or the legal equivalents found in this Code into their own operations.

1.2 Environmental Policy

Our environmental policies and management procedures always meet or exceed UK and European legal requirements. We are also pleased to confirm a number of voluntary measures which go beyond the scope of legal mandate. These include the recent addition of hybrid electric vehicles to our company fleet, and the complete renovation of new head office premises in the UK featuring a range of environmental measures including enhanced energy-efficiency, the use of sustainable materials, and eco-friendly lighting.

In addition to these measures, Hutchison Technologies pledges to do the following:

- Integrate environmental awareness into our decision-making and operations
- Engage in ethical waste management practices
- Engage in working practices that minimise the use of pollutants wherever possible
- Recycle or reuse as much as possible
- Minimise energy usage, water usage, and natural resource consumption within our facilities and processes
- Train and educate our employees on environmental issues surrounding their work

1.3 Health & Safety Policy

Hutchison Technologies Ltd are committed to providing safe work environments that operate in the strictest accordance with health and safety regulations and legislation. We will always ensure the following:

- Named personnel have been appointed for emergency response, health and safety, and fire marshal responsibilities in each of our facilities
- First Aid personnel have been appointed in each of our facilities
- We have established a system whereby accidents in our facilities are reported, recorded, and investigated. This system meets legal requirements
- All staff receive appropriate safety training, equipment, and protective clothing for the requirements of their job roles
- An appropriate system is in place for the disposal of hazardous materials in all of our facilities

- Our equipment safety management meets legal requirements
- All electrical components and systems used in our facilities or during the course of contracted works offsite are properly maintained and meet legal requirements for annual testing
- Noise levels are monitored and regulated to meet legal requirements
- Our facilities are lit, ventilated and temperature-controlled to meet legal requirements
- Potable water, bathrooms, and sufficient kitchen facilities are provided in each of our facilities
- Our suppliers are required to maintain their own facilities to the minimum standards outlined above

1.4 Our Recruitment Policy

Hutchison Technologies Ltd promotes employee welfare and protects workers' rights, believing that this has a positive impact on staff wellness, productivity, and our business success as a whole. We operate internal employment practices in line, at the very least, with the minimum legal requirements for employee protection. We will ensure the following:

- Only the requirements of the job are observed in our recruitment and termination practices
- Discrimination on the basis of age, disability, sex, sexual orientation, gender reassignment, ethnicity, race, marital status, religious or philosophical belief, pregnancy or maternity, or other individual difference is not acceptable within our business
- Employees will be provided with a written statement that clearly outlines the terms and conditions of their employment, and which defines the reciprocal duties that exist between the employee and Hutchison Technologies
- We comply with and exceed statutory requirements regarding working hours, pay, and entitlement to leave
- We will provide a safe, secure, and healthy working environment
- Abuse, coercion, harassment and inappropriate disciplinary action in all forms are prohibited
- Statutory sick pay (SSP) will be paid to qualifying workers
- A system has been implemented for the fair procedure of disciplinary and grievance hearings
- Maternity and paternity rights are fully observed

1.4.1 Equal Opportunities and Diversity Policy

At Hutchison Technologies, we welcome applications from all and appoint based on merit. We are committed to promoting diversity throughout our organisation.

The Equalities Act 2010, which superseded the Disability Discrimination Act 2005 (better known as 'DDA Compliance'), states that companies must provide reasonable access into and throughout company facilities such that a disabled employee would be able to move freely throughout their place of work.

Hutchison Technologies Ltd confirms its compliance with the Equalities Act 2010, and confirms that it has taken measures above and beyond the legal scope of the Act in the development of new company premises in the UK.

1.4.2 Living Wage

Hutchison Technologies Ltd is an accredited Living Wage employer. The Living Wage is an hourly rate set independently and updated annually, and is calculated according to the basic cost of living in the UK. There are two rates of Living Wage:

one for those based in Greater London (London Living Wage) and another rate for the rest of the UK (UK Living Wage).

Hutchison Technologies Ltd is also committed to paying a fair wage to our directly employed staff outside of the UK. Additionally, we expect our suppliers to pay a wage at least equivalent to the minimum legal requirement in their country of operation, or a comparably fair rate.

1.4.3 Whistleblowing Policy

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work. Although certain circumstances are covered by law, Hutchison Technologies maintains a policy on safeguarding its employees

1.4.4 Anti-Slavery Policy

Hutchison Technologies has a zero-tolerance approach to modern slavery and human trafficking and is committed to upholding and respecting human rights. We recognise that the practice of modern slavery takes varying forms including servitude, forced labour, child labour, human trafficking, and any and all forms of the deprivation of one's liberty by another for personal or commercial gain.

We pledge to act ethically and with integrity in all our business dealings and supply chain relationships, and never to knowingly use products or services derived in any part from the practice of modern slavery in any of its forms. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy. We may terminate contracts at any time should any instances of modern slavery come to light.

For more information, please refer to our Modern Slavery Statement 2019.