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Code of Ethics

Chisholm & Winch [Contracts] Ltd conducts its business honestly and ethically wherever we operate. We will constantly improve the quality of our service, products and operations and will create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgement. No illegal or unethical conduct on the part of Directors, employees or affiliates is in the Company's best interest. Chisholm & Winch [Contracts] Ltd will not compromise its principles for short-term advantage. The ethical performance of this Company is the sum of ethics of the men and women who work here. Thus, we are all expected to adhere to high standards of personal integrity.

Directors and employees of the company must never permit their personal interests to conflict, or appear to conflict, with the interest of the company, its clients or affiliates. Directors and employees must be particularly careful to avoid representing Chisholm & Winch [Contracts] Ltd in any transaction with others with whom there is any outside business affiliation or relationship. Directors and employees shall avoid using their company contacts to advance their private business or personal interests at the expense of the company, its clients or affiliates.

No bribes, kickbacks or other similar re-numeration or consideration shall be given to any person or organisation in order to attract or influence business activity. Directors and employees shall avoid gifts, gratuities, fees, bonuses or excessive entertainment in order to attract or influence business activity.

Directors and employees of Chisholm & Winch [Contracts] Ltd will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to assure that such information is strictly safeguarded. This information whether it is on behalf of our marketing strategies, customer lists, personnel records, upcoming acquisitions and divestitures, new investments and manufacturing costs, processes and methods. Proprietary, confidential and sensitive business information about this company, other companies, individuals and entities should be treated with sensitivity and discretion and only be disseminated on a need-to-know basis.

Directors and employees will seek to report all information accurately and honestly, and as otherwise required by applicable reporting requirements.

Directors and employees Directors and employees will refrain from gathering competitor's intelligence by illegal means and refrain from acting on knowledge which has been gathered in such a manner. The Directors and employees of Chisholm and Winch [Contracts] Ltd will seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

Directors and employees will obey all Equal Employment Opportunity Laws and Acts with respect and responsibility towards others in all of their dealings.

Directors and employees agree to disclose unethical, dishonest, fraudulent and illegal behaviour, or the violation of company policies and procedures, directly to management.

Violation of this code of Ethics can result in discipline, including possible termination. The degree of discipline relates in part to whether there was a voluntary disclosure of any ethical violation and whether or not the violator co-operated in any subsequent investigation.

Good Ethics is Good Business.

A handwritten signature in blue ink, appearing to be 'A. M. B.', is written over a faint circular stamp.

Signed:

Dated: 03/01/2017