

Corporate Code of Conduct

Version 1.0 Correct as at November 2018

Purpose

This policy affirms MSL's belief in responsible social and ethical behaviour from all employees. This policy clarifies the standards of behaviour that MSL expects of all employees.

Principles

Our employees contribute to the success of our organisation and that of our customers. MSL fully endorse that all employees are not deprived of their basic human rights.

Furthermore, our employees have an obligation to the organisation, our customers and themselves to observe high standards of integrity and fair dealing. Unlawful and unethical business practices undermine employee and customer trust.

Policy

Our Code of Conduct policy applies to all employees and provides the framework of principles for conducting business, dealing with other employees, customers and suppliers. The Code of Conduct does not replace legislation and if any part of it is in conflict, then legislation takes precedence. This policy is based on the following:

- Act and maintain a high standard of integrity and professionalism
- Be responsible and scrupulous in the proper use of Company information, funds, equipment and facilities
- At all times act in accordance with MSL policy and local legislation when dealing with MSL and/or customer confidential information.
- Be considerate and respectful of the environment and others
- Exercise fairness, equality, courtesy, consideration and sensitivity in dealing with other employees, clients and suppliers
- Avoid apparent conflict of interests, promptly disclosing to an MSL senior manager, any interest which may constitute a conflict of interest
- Promote the interests of MSL
- Perform duties with skill, honesty, care and diligence
- Abide by policies, procedures and lawful directions that relate to your employment with MSL and/or our customers
- Avoid the perception that any business transaction may be influenced by offering or accepting gifts

- Under no circumstances may employees offer or accept money in exchange for securing or influencing business decisions
- Any employee, who in good faith, raises a complaint or discloses an alleged breach of the Code, whilst following correct reporting procedures, will not be disadvantaged or prejudiced. All reports will be dealt with in a timely and confidential manner.

MSL expects co-operation from all employees in conducting themselves in a professional, ethical and socially acceptable manner of the highest standards. Any employee in breach of this policy may be subject to disciplinary action, including termination.

Should an employee have doubts about any aspect of the Code of Conduct, they must seek clarification from their Manager, or if that is not appropriate from an appropriate senior Manager in the organisation.

This policy will be regularly reviewed by MSL and any necessary changes will be implemented by the Executive.

This policy, along with all other corporate and employment policies, can be found on the MPower MSL HR Sharepoint site.