Ethics (Business and Social) Policy Statement



WCS Group's approach to business is based upon a core set of values which are designed to be consistent with the ethical conduct of WCS Group's business at all times. The Group has a responsible ethics (business and social) policy.

The Board of Directors are responsible for the implementation of this policy and compliance with the policy will be monitored by senior management, Health and Safety management and HR advisors. The policy and objectives are regularly audited and reviewed.

The company expects the same standards from subcontractors – in particular related to ethical behaviour in procurement from suppliers and sales to customers alike.

Guiding principles

A. General moral imperatives

- We respect the quality of life of all people and affirm an obligation to protect fundamental human rights and respect diversity in culture and belief
- We aim to ensure that our products and services are used in socially responsible ways and avoid harmful
 health, welfare and economic effects with the safe sustainability of the environment foremost in our mind
- Senior management who are accountable for the design, development, manufacture, set-up and
 operation of processes and systems on client sites will do so in a legal, regulatory and moral way ensuring
 safety, compliance, prudence and protection of human life and the environment
- Integrity and trustworthiness are essential from all decision-makers
- All board members and senior management are expected to act and conduct themselves with the highest standards of professional integrity, honesty and ethical conduct when working on Group or customer business
- Fairness, tolerance, respect for others and maintaining confidentiality are key requirements of the Group's ethical policy
- Transparency, to eradicate corruption and discrimination and to uphold the reputation of the Group and its clients are seen as central to maintaining on-going ethical business relationships
- Pride and a continuous focus on quality and successful outcomes, are also central to meeting Group and customer business and social objectives

B. Specific professional responsibilities

 Live the vision, mission and values of WCS Group each day. For quick reference, they can be summarised as: -

Vision

"To be recognised for the highest standards and outstanding outcomes in water treatment, control and operating systems".

Mission

- To achieve sustainable growth through excellence, innovation, technology, compliance enhancement and competitive advantage.
- To continuously develop human resources, create safe working environments, improve productivity, quality and reduce cost and waste.
- To enable smart system risk management and processes to protect against scale, corrosion and bacteria which can impact on plant reliability, safety and performance over time.
- To satisfy customers, employees and shareholders responsibly and reliably.
- To be good corporate citizens, business partners and socially responsible partners in order to protect sustainable business growth and wellbeing.

Reference: 200 / 08 Issue: 4 Date: 26/08/20 Prepared by: C. Abraham Approved by: P. Greenwood

Ethics (Business and Social) Policy Statement



Values

- Zeal to excel and zest for change improvement
- Quality decision-making
- Integrity and fairness all day, every day
- Technical proficiency
- Respect for others
- Do exactly what we say and promise
- Ensure speed of response
- Foster learning, creativity and team work
- Loyalty and pride in the company, client operations and community
- Strive to achieve the highest quality, effectiveness and standards in both processes / products and professional work – we want to aim for and expect to set the "highest standards"
- Acquire and maintain technical competence which adds value
- · Compliance with the law, spirit of the law and relevant regulation and best industry practice
- Accept and encourage professional review and feedback
- Manage personnel and other resources effectively
- · Be upfront and avoid inducements and compromise
- Observe Group Employment and Code of Conduct, Corporate Responsibility standards expected by the Group, its shareholders and customers
- Conduct ourselves in a manner that reflects credit to the Group
- Be accountable to shareholders and customers
- Prevent inside dealing
- Identify, mitigate and manage business risks
- Protect Group and customer property, assets, infrastructure and reputation

C. Specific additional provisions for Board members and senior management

Board members must undertake to advise colleagues of events / circumstances which may interfere with their ability to perform or deliver the desired results or methods which might mean the Group's Mission and Values are not maintained.

Board members must avoid conflicts of interest and opportunities for personal gain.

Miscellaneous points

- The company takes accreditation and related operating standards seriously and will continually seek to
 operate to standards demanded for recognition by external interested parties, including: CHAS, Legionella
 Control Association, IOSH, SafeContractor, ISOQAR, Constructionline, Closed System Control
 Association:
- The company adherences to requirements of the Equality Act 2010 and the Modern Slavery Act 2015;
- The company adheres to the Prevention of Corruption Acts 1889 to 1916 and the Bribery Act 2010;
- Staff are expected to refuse gifts or inducements from customers and suppliers or report acceptance to a line manager and the circumstances (excludes work related gifts such as branded gold balls, calendars, pens and the like) with gifts accepted or refused recorded in writing;
- Lavish entertaining, social events or expenses are not accepted;
- Fraud and false representation is unacceptable;
- The company adheres to the Data Protection Act 2018 (compliant with GDPR) in respect of client confidentiality and data;
- Good client / contractor relationships are encouraged focused on relevance, scope of service, competitive price and value-added outcome. Staff are expected to be: -
 - Fair, efficient and courteous at all times
 - Preserve the highest standards of integrity and impartiality

Reference: 200 / 08 Issue: 4 Date: 26/08/20 Prepared by: C. Abraham Approved by: P. Greenwood

Ethics (Business and Social) Policy Statement



- Achieve the highest professional standards
- Be honest at all times
- Provide clear specifications and recommendations and work hard to produce stated outcomes
- Prompt at honouring promises, services and paying suppliers
- Respond positively and courtesy to suggestions, enquiries, suggestions and complaints

We will review this policy regularly.

in hom

Phil Greenwood

Chief Executive Officer