

BUSINESS ETHICS POLICY

Including: Honesty & Integrity, Equality & Diversity, Tax Evasion & Money Laundering, Bribery, Corruption & Fraud, Conflict of Interest, Confidentiality, Slavery & Human Trafficking, Corporate Social Responsibility (CSR) & Sustainable Procurement, Conflict Minerals, and Whistleblowing

At Berry & Escott Engineering, we are committed to providing quality products and services in an ethical and responsible manner across our entire business and supply chain.

This Business Ethics Policy establishes Berry & Escott Engineering's core ethical beliefs, set by the directors and embedded into the business culture. All employees are aware of and are bound to comply with these beliefs, and our supply chain is continuously reviewed with these in mind.

All employees are encouraged to help foster a questioning attitude, and to flag any risk of ethical lapses to the Human Resources manager and/or the Whistleblowing system.

Further information on each topic is included within the Berry & Escott Employee Handbook, which is available to all employees in the office areas.

Honesty and integrity

All employees will be considerate of Berry & Escott Engineering's reputation and credibility, be honest and respectable in all dealings with other employees, the public, the business community, customers, suppliers, competitors and government authorities.

Employment Practices, Equality & Diversity

Berry & Escott Engineering strives to provide a positive work environment that supports productivity, dignity and self-esteem, and the pursuit of personal goals. Our employment policies and procedures provide for equal opportunity and fairness in employment decisions.

Berry & Escott Engineering is committed to promoting equality and diversity in all its activities to promote inclusive processes, practices and culture.

- We will strive to work to eliminate any unlawful or unfair discrimination including direct or indirect discrimination, discrimination by association, discrimination linked to a protected characteristic, harassment and victimisation.
- We will remain proactive in taking steps to ensure inclusion and engagement for all the people who work for and with us.
- We will continue to strive towards a culture that is diverse and inclusive that recognises and develops the potential of all staff.
- We recognise the business benefits and opportunities of having a diverse community of staff who value one another and the contribution they can make.

Compliance with Laws, including Tax Evasion & Money Laundering

Berry & Escott Engineering's business will be conducted in compliance with all applicable domestic and international law. All employees will be made aware of the legal requirements that apply to their role within Berry & Escott Engineering. Berry & Escott Engineering will not tolerate illegal activity conducted for personal gain or on the company's behalf, including any violation of tax law.

Bribery, Corruption & Fraud

Berry & Escott Engineering has a zero-tolerance policy towards bribery, fraud and corruption and is committed to acting fairly and with integrity in all its business dealings and relationships.

Conflict of Interest and Misuse of Company Resources

All Berry & Escott Engineering employees are expected to act in the best interests of the business, first and foremost. Employees will avoid any activities or situations where personal interests are, or appear to be, in competition with or in opposition to Berry & Escott Engineering's interests. This includes:

- Competing business interests
- Insider Trading
- Use of employment activities for personal gain
- Misuse of Company property or resources
- Personal transactions with Berry & Escott Engineering business associates

Corporate Information and Confidentiality

Information considered confidential at Berry & Escott Engineering is considered as, but not limited to:

- Technical information/drawings
- Financial data
- Work process information
- Price lists
- Business plans and intentions
- Legal matters
- Applications for patents and trademarks
- Software developments
- Commercial and technical information received on a confidential basis from third parties such as suppliers or customers
- Operation methods

All employees are expected to treat confidential information as such, by not revealing it to anyone, either while employed at Berry & Escott Engineering or after they leave the company, unless they have written authorisation from a Director.

Corporate Communications

All public communications made by or on behalf of Berry & Escott Engineering shall be full, fair, accurate, timely and understandable.

Slavery and Human Trafficking

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Berry & Escott Engineering have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Corporate Social Responsibility (CSR) & Sustainable Procurement

Berry & Escott Engineering are committed to understanding and managing the environmental, economic and social impacts of our operations through the delivery of sustainable solutions, and strive to embed the consideration of these issues into the culture of decision making across the business.

Conflict Minerals

Berry & Escott Engineering is committed to ensuring that the products it sells do not incorporate "conflict minerals," which are minerals smelted into tin, tantalum, tungsten and gold sourced from entities which directly or indirectly finance conflict as defined by the Conflict Minerals Regulation 2021.

Whistleblowing Policy and Procedure

Berry & Escott Engineering provides for the confidential and anonymous reporting of any Health & Safety, Quality, Environmental or Ethical issue, not limited to those contained within this policy, without reprisal to those reporting.

All reports or other information received regarding alleged violations of this Ethics Policy shall be investigated by or reported to a Director. Any person who is found to have violated this Ethics Policy, or any related policy, will be subject to disciplinary action.

Lee Berry
Director



Chris Escott
Director



Reviewed and Signed: 7th January 2026