

## 1. Ethical Policy

### *Introduction*

The overall aim of our Ethical Policy is to ensure that our business operates in an ethical manner. Supporting this aim, the company subscribes to the SEDEX Code of Practice. It is the responsibility of all employees to identify and report incidents of Ethical Policy non-conformance, and ideas for improvement.

### *Policy*

We at Test Valley Ltd:

- Ensure our business activities are ethical
- Endeavour to maintain an ethical supply chain
- Prohibit bribery, corruption and fraudulent business practice
- Subscribe to the SEDEX Code of Practice
- Comply with all applicable ethical legislation and regulations
- Ensure all staff receive role-appropriate ethical training
- Ensure our Ethical Policy is available to interested parties

Our Ethical Policy is supported by our Ethical & Social Responsibility Policy Notice – see below

## 2. Ethical & Social Responsibility Policy Notice

### *Introduction*

This Ethical & Social Responsibility Policy Notice supports the company's Ethical Policy and Social Responsibility Policy.

### *Notice*

As a business we have a responsibility to ensure that we operate in an ethical and responsible manner, and to endeavour to ensure that the organisations in our supply chain do the same. To this end, we operate a supplier audit process and subscribe to SEDEX, the Supplier Ethical Data Exchange.

SEDEX is a not-for-profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. SEDEX provides a secure, online database that allows members to store, share and report on supplier Labour Standards, Health & Safety, Environment and Business Ethics. Our SEDEX Client Number is: S000000036796.

In accordance with SEDEX and other Ethical Supply groups, we advocate fair trade and employment in the supply chain, in particular Enabling Rights, these being worker's rights to 'Freedom of Association' and 'Collective Bargaining'.

Furthermore, whilst we are not currently subject to the Modern Slavery Act 2015, we do operate in accordance with the ethics of the Act. As such, we adhere to the following in our operations, and expect the organisations in our supply chain do the same:

- No forced labour or human trafficking
- Employment is freely chosen
- Working conditions are clean, healthy and safe
- Working hours are not excessive and are within the working time regulations applicable in the jurisdiction where the process takes place
- A fair wage is paid
- No exploitation of child labour
- No harsh, cruel or degrading practices
- No discrimination

Additionally, all of our workers may, without fear of reprisal, contact any of our company directors to confidentially discuss any grievances or concerns they may have regarding any aspect of our business, including business ethics and social responsibility.

Finally, we acknowledge the efforts of government organisations to end violence and atrocities in Central Africa Republic, Sudan, Congo Republic, Democratic Republic of the Congo, Angola, Zambia, Tanzania, Uganda, Rwanda and Barundi. Consistent with this, the products that we supply are 'DRC Conflict-Free'. This means that they do not contain tantalum, tin, tungsten or gold ('3TG'), and do not require these elements for their production or functionality.