

SL ENGINEERS - INTEGRITY MANAGEMENT POLICY

At SL Engineers we care strongly about integrity, our name and reputation as these are our core asset. This is why we have developed our Integrity Management Policy (IMP). The basic principles are as follow:

1. GENERAL PRINCIPLES

1.1 The Company's ethical principles are loyalty, respect for people, transparency and business integrity. All employees, partners and subcontractors are to adhere to the principles and the Company requires Managers to lead by example in this effort.

2. ORGANISATIONAL CULTURE

2.1 The Company promotes an organisational culture of integrity, enabling appropriate responses to moral or legal issues that inevitably arise as Council does business.

2.2 The Company accepts that:

- a) There is an intrinsic connection between a culture of integrity in its organisation and the reduction of the incidence of misconduct;
- b) A culture of integrity depends upon both a commitment to act with integrity and the capacity to act with integrity; and
- c) The capacity to act with integrity exists through the creation of a policy which guides directors, employees, contractors, consultants and volunteers of the Company on standards of behaviour, attitudes and beliefs.

3. COMMITMENT

3.1 While Directors and management must provide leadership and lead by example, all employees, contractors, consultants and volunteers of Council must take responsibility for behaving with integrity at all times.

3.2 A strong sense of personal moral responsibility is an excellent foundation for behaving with integrity. However, in order for the Company to have a culture of integrity, it must embed a common set of organisational values in order to influence and guide managerial and operational decision-making.

3.3 The Company accepts that in a culture of integrity, ethical standards must permeate every level of its operations. SL Engineers' internal management structures are committed to:

- Promote ethical behaviour at every level;
- Provide resources to promoting ethical behaviour; and
- Ensure that issues are appropriately reported and investigated.

3.4 As and when necessary, the Company may use independent employees or external agencies to investigate complaints in accordance with our procedures.

4. RISKS

4.1 The followings are examples of the types of behaviour that this policy seeks to eliminate:

1. Intentional breaches of the Company's or clients HSE Standards
2. Conflicts of Interest
3. Fraud & bribery
4. Insider dealing and illegal information brokering
Political Payments of any kind
5. Discriminatory behaviour

6. Criminal acts

7. Harassment

5. GIFTS

5.1 The Company has to ensure that it is seen to act with upmost integrity at all times and although gifts may form part of the normal course of business employees need to be aware of the Company's policy as to what gifts and hospitality are acceptable.

5.2 Small gifts and invitations to lunch or social events are acceptable however any gift or invite which appears to the employee to be excessive should be discussed with their Line Manager. Such invitations and gifts must be recorded on a Conflict of Interest Form, approved and signed by Line Manager and forwarded to any Director for inclusion in the central Conflict of Interest Register.

5.3 Should they require a gift for a client, members of the Management team should contact their line manager or any Director who will be able to supply suitable Company merchandise.

6. CONFLICTS OF INTEREST

6.1 Employees and contractors must not use their positions within the organisation for personal gain.

6.2 Employees and service providers must declare personal relationship and/or relatives linked to a position that may be able to influence the performance of the Company.

6.3 Employees and subcontractors must not divulge confidential information pertaining to the Company to those who should not receive such information.

6.4 Employees are generally permitted to engage in other employment and interests in the time when they are not working for the Company, as long as it does not interfere with their work for the Company or give rise to a conflict of interests.

6.5 The Company maintains a central Conflict of Interest Register and employees should record shareholdings, directorships or positions of influence held by them or their close family members in companies which are the Company's competitors, contractors or suppliers or which are connected to the Company in some other way which could give rise to a conflict.

6.6 Shareholdings in publically quoted companies do not need to be declared.

7. WHISTLEBLOWING

7.1 Where employees have concerns in relation to the failure to observe the above guidelines by their colleagues, they should refer to the Company's Whistle-blowing policy.

8. RECORDS

8.1 The Company will maintain record keeping systems and ensure that appropriate levels of confidentiality of records are maintained, to encourage internal and external confidence in its ability to deal with integrity issues.

"At SL Engineers, Directors, managers, employees, business partners and service providers are all expected to do the right thing" Louis Lefevre

9. CHANGES TO THIS POLICY

9.1 This policy is to remain in force until any of the following occur:

1. The related information is amended/replaced; or



2. Other circumstances as determined from time to time by the Company.

For and On Behalf of SL Engineers

Louis Lefevre

Technical Director