



## Code of Ethics

*'It is the policy of Drurys Engineering Limited that Drurys Engineering Limited, its subsidiary and controlled entities, its and their directors, officers and employees and others acting on its or their behalf shall neither offer promise nor give, nor seek, corruptly any benefit of any sort whatever, whether directly or indirectly, in connection with the performance of the business of Drurys Engineering Limited.'*

### 1 **Honesty**

Drurys Engineering Limited is committed to the highest standards of ethical conduct in all that it does. The Company complies with all applicable legal and regulatory requirements governing business relationships and international trade, including relevant export and import control regulations. Drurys Engineering Limited believes that honesty and integrity engender trust and it conducts its business in accordance with all the applicable laws and regulations of the countries in which it does business and requires that its employees, agents and advisers also comply with such laws.

### 2 **Prohibition of Bribery Corruption and Extortion**

DRURYS ENGINEERING LIMITED does not offer, promise, give, demand or accept bribes or other unethical inducements, including extortion, in order to obtain, retain or give business or other advantage and takes all reasonable measures within its power to ensure that its employees, advisers and agents follow the same practice.



### 3 Competition

DRURYS ENGINEERING LIMITED competes fairly and vigorously in its market sector and it does not engage in, nor is it a party to, any agreements, business practices or conduct that, as a matter of law, are anticompetitive or may be construed as participation in trade or associated cartels.

### 4 Integrity in Business Behaviour

DRURYS ENGINEERING LIMITED expects its employees to act with integrity at all times. DRURYS ENGINEERING LIMITED employees who have access to privileged information must not use it to achieve personal gain for themselves or others and no employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with DRURYS ENGINEERING LIMITED, or which might compromise their ability to meet the responsibilities of their job.

### 5 Customer, Supplier and Sub Contractor Relationships

DRURYS ENGINEERING LIMITED seeks to provide its customers with products and services which meet or exceed their requirement, to respond quickly to changing customer demand and to seek to continuously improve product quality, value and delivery times. DRURYS ENGINEERING LIMITED believes in working in partnership with suppliers and subcontractors to meet its customers' expectations and ensure quality, value and timeliness of delivery. Payment to suppliers and



subcontractors will be made promptly within the agreed terms of business.

## 6 Employees

DRURYS ENGINEERING LIMITED recruits, selects and promotes employees on the basis of their qualifications, skills, aptitude and attitude and treats all its employees with respect and dignity. Harassment or bullying is unacceptable. DRURYS ENGINEERING LIMITED complies with all relevant anti-discrimination legislation and regulations in the countries in which it does business in respect of its employment related decisions.

## 7 Health and Safety

DRURYS ENGINEERING LIMITED is committed to conducting all its activities in a manner which achieves the highest practicable standards of health and safety.

## 8 Environment

DRURYS ENGINEERING LIMITED is committed to a proactive policy on environmental issues. A priority objective is the reduction and management of waste through better utilisation of raw materials, energy resources and water supplies, as well as minimising waste at source, and employing re-use or recycling techniques. Employees will be educated and trained to carry out tasks in an environmentally responsible manner and are expected to act in accordance with the policy and training provided.



## 9 Human Rights

DRURYS ENGINEERING LIMITED adheres to all relevant government guidelines designed to ensure that products are not incorporated into weapons or other equipment used for the purposes of terrorism, internal repression or the abuse of human rights. DRURYS ENGINEERING LIMITED seeks to uphold all internationally recognized human rights wherever its operations are based.

## 10 Reporting and Internal Controls

DRURYS ENGINEERING LIMITED records all business transactions accurately prudently and transparently in compliance with its accounting standards and utilises appropriate internal controls to ensure that it is managed effectively and that the reported results are accurate. DRURYS ENGINEERING LIMITED will retain and review all records of instances of initial and continuance training, annual employee records of compliance and records of gifts and benefits, whether accepted or not.

## 11 Application and Compliance

This Code of Ethics applies throughout the Company and to all its employees, temporary contractors, third party sales advisors, agents, consultants and distributors worldwide. Disregard or breach of the code by may result in disciplinary action against an employee and sanctions/and or immediate dismissal for third parties representing the company. DRURYS ENGINEERING LIMITED seeks, wherever possible, to ensure that its key suppliers, business partners and any joint venture or offset project in which it participates, complies with the DRURYS



ENGINEERING LIMITED code of ethics or has in place a similar code and business process of its own. DRURYS ENGINEERING LIMITED expects employees to bring any suspected or actual breach of the Code promptly to management attention. Any employee making such information known to management through the appropriate procedures will not face any adverse or unfavourable treatment for such disclosure.