



**ETHICS**  
**RESPECT**  
**CODE**  
**HONESTY**  
**INTEGRITY**

# **OUR CODE OF BUSINESS CONDUCT**

2025

# A MESSAGE FROM OUR CEO

The Code of Business Conduct (the 'Code') holds great significance in today's corporate landscape. It serves as a guiding principle that outlines the legal, ethical and moral expectations of our employees and stakeholders within EnerMech. Our CEO, Charles 'Chuck' Davison Jr., explains how this Code not only protects us from misconduct but also safeguards the reputation and credibility of the company.



*"We set ourselves high standards, and right across our organization, we must ensure we live up to them.*

*Our commitment to pursuing and maintaining the highest standards of conduct in the way we deal with our customers, our suppliers, our colleagues, and the communities in which we work has always been at the heart of our success. Our core values define us as a business, who we are, how we work, what we believe in, and what we stand for, and adhering to them is what has made us and will continue to make us a trusted business partner of choice wherever we work.*

*Our world is changing rapidly, and we have demonstrated that we have the agility to change with it, but in doing so we can never lose sight of the principles we hold dear. Our Code of Business Conduct brings together all of those principles, setting out our ethical, legal, and business standards, giving clear guidelines expected of each and every employee.*

*The Code doesn't just apply to our EnerMech personnel but to all of those we work with, including our contractors, agents, consultants, and representatives. We expect them to adhere to the same high standards as we do ourselves and it's a non-negotiable aspect of working with us.*

*The subjects governed by our Code of Business Conduct are wide ranging, spanning across everything from how we use our IT and internet, and how we work with one another (as set out by our policies on issues such as equal opportunities and discrimination), to anti-bribery, money laundering, and global operations.*

*The Code should never be viewed as something which imposes unwelcome restrictions on how we behave or how we operate, but seen as something we can be proud of, confirming how EnerMech is committed to 'doing the right thing' not because we have to, but because we want to.*

*We are where we are today because of our reputation as a trusted and reliable partner that adheres to the highest standards in all that we do. Our reputation has been built by you – our people – and through your personal integrity comes our business integrity.*

*It is thanks to all of you who are upholding our Code that EnerMech continues to flourish and grow."*

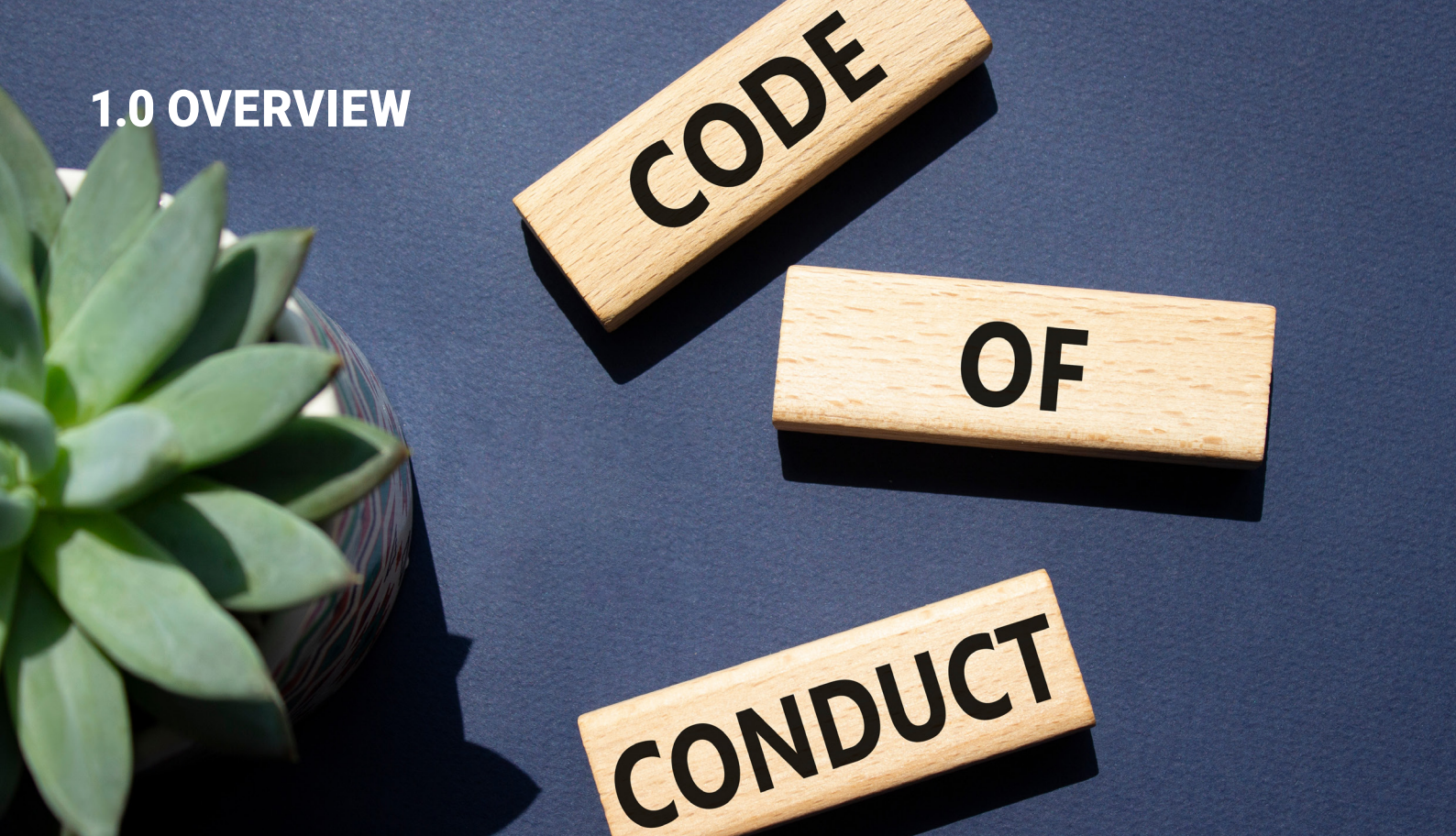
**Charles 'Chuck' Davison Jr.**  
Chief Executive Officer



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# 1.0 OVERVIEW



## 1.1 What is the Code of Business Conduct?

The purpose of the Code is to:

### Guide Decision-Making:

The Code offers a blueprint to help you make decisions that align with our core values and principles, ensuring we act legally, ethically, and fairly at all times. By following the Code, you ensure compliance with applicable laws and regulations including the UK Bribery Act and the US Foreign Corrupt Practices Act.

### Navigate Professional Challenges:

The Code provides clarity and understanding, ensuring that no matter where we are in the world, we act with integrity and respect.

Key aspects the Code touches upon include:

### Business and Personal Integrity:

Upholding honesty and transparency.

### Operating Globally:

Recognizing the responsibilities that come with a worldwide presence, and ensuring we respect local cultures, laws, and the environment

### Safeguarding Our Assets:

Protecting not only our physical assets but also our reputation, intellectual property, and brand.

### Working Together:

Promoting collaboration, respect, and fairness while upholding the highest standards of corporate governance and ethical behaviour

By adhering to the Code, we comply with legal and regulatory requirements and reinforce our commitment to sustainability and a responsible future. This safeguards EnerMech's reputation and paves the way for an ethical, fair, and successful future.



## 1.2 Who does the Code apply to?

**Reference to 'EnerMech' means all members of the EnerMech Group of companies globally, including subsidiaries, branches, joint ventures, and other strategic partnerships.**

The Code applies to all personnel, including leadership, staff (directors, officers, employees), temporary, part-time, and agency workers, as well as third parties such as contractors, consultants, agents, and intermediaries.

Regardless of your location or relationship with EnerMech, you are responsible for upholding its reputation and values.

## 1.3 How to use the Code

**The Code is a practical tool to guide your actions and decisions. It's more than just a set of rules — it's a living document that supports you in upholding our values and making ethical decisions. Here's how you can use it effectively:**

- **Engage with the Code Daily:**  
Consult the Code when facing challenges to help guide your decision-making. For example, if you're unsure about accepting a gift from a supplier, the Code can help clarify our policy on gifts and hospitality.
- **Regular Consultation:**  
Make the Code part of your routine business practices. Whether onboarding new responsibilities or engaging with external partners, the Code should be a constant reference point to ensure that we operate with integrity and compliance.
- **Digital Accessibility:**  
If you're using a digital version of the Code, take advantage of interactive features such as quick links and search functions to navigate the document easily. These tools make it easier to find relevant sections, policies, or guidelines.
- **Connection to Supporting Policies:**  
The Code is linked to a range of supporting policies and procedures. These links are essential in helping you understand the full scope of our expectations.

- **Use as a Decision-Making Tool:**  
The Code is a decision-making tool. Whether you're handling sensitive data, dealing with third-party suppliers, or facing an ethical dilemma, the Code should be your guide in making choices that reflect our values and legal obligations.
- **Reporting Concerns and Speaking Up:**  
If you suspect any violations of the Code, whether within EnerMech or among third parties, you are encouraged to speak up. Reporting channels are available, including internal hotlines and compliance contacts, ensuring that concerns can be raised confidentially and without fear of retaliation.

By integrating the Code into your daily routine, you foster a culture of transparency, integrity, and respect across the organization.

## 1.4 Consequences of Non-Compliance

Failure to follow the Code, whether intentional or not, could lead to significant repercussions including personal legal liabilities, disciplinary actions, and termination.

**Legal Implications:** Breaking the law or our Code can result in legal actions, both criminal and civil, against both EnerMech and those responsible.

If you have concerns about any actions or decisions, refer to the [Speaking Up Policy](#). We encourage everyone to raise concerns in good faith without fear of retaliation.



## 2.0 OUR VALUES, STRATEGY, AND ESG



### 2.1 Guiding Global Business with Transparency, Passion, Collaboration, and Innovation

The Code reflects our core values of Transparency, Passion, Collaboration, and Innovation, as well as our business ethos and Environmental, Social, and Governance ('ESG') considerations. It serves as a reflection and embodiment of the principles that guide our operations. By aligning the Code with our core values, we ensure ethical conduct is deeply ingrained in the organization's DNA.

Moreover, the Code plays a critical role in supporting our strategy. It provides a framework for decision-making that aligns with the strategic goals of the company.

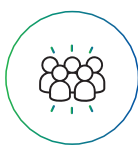
### Safety. Quality. Integrity.



Transparency



Passion



Collaboration



Innovation

### 2.2 Strategy

Considerations including environmental impact, social responsibility, and corporate governance are central to our strategy. By incorporating these considerations into the Code, we demonstrate our commitment to sustainable and responsible business practices.

Intrinsically linked to our values, strategy, and ESG principles, the Code serves as a catalyst for positive change, to drive innovation, encourage diversity and inclusion, and foster a culture of continuous improvement.

### 2.3 ESG

**Our Commitment to ESG: Leading Positive Change**  
At EnerMech, we view ESG as an opportunity to improve business, environmental, and social outcomes. We embrace the complex challenges of today's world by making responsible decisions that positively impact our planet, our people, and our communities.

Our approach to ESG is guided by international standards, including the Global Reporting Initiative (GRI) and the Greenhouse Gas Protocol (GHG). We also align with the Task Force on Climate-Related Financial Disclosures (TCFD) and the Sustainable Accounting Standards Board (SASB) standards. Our dedication to sustainability is reflected in our efforts to support our customers' net-zero ambitions, eliminate modern slavery in our supply chain, and deliver a low-carbon future.

Through transparent reporting and ambitious targets, including our pledge to achieve net zero carbon emissions by 2050, we ensure that ESG is central to how we operate. For more details, see our [ESG Annual Report](#).



## 3.0 OUR RESPONSIBILITIES



### 3.1 Leadership Demonstration

**Leaders set the tone for ethical behaviour and upholding the Code. As custodians of EnerMech's values and reputation, our leaders have responsibilities when it comes to adhering to the Code.**

By exemplifying ethical behaviour, effectively communicating the Code, providing guidance and support, enforcing accountability, and continuously evaluating and improving the Code, leaders can create an environment where ethical conduct thrives.

**Here are some key leadership responsibilities in this regard:**

#### **Model Ethical Behaviour:**

Leaders are expected to set an example by demonstrating ethical behaviour in their actions and decisions. By adhering to the Code themselves, leaders inspire others to do the same.

#### **Communicate and Educate:**

Leaders are responsible for communicating the Code to all employees, ensuring that everyone understands the expectations and implications of the Code. Regular training sessions and open discussions reinforce the importance of ethical conduct.

#### **Provide Guidance and Support:**

By providing guidance and support to employees who may have questions or concerns related to the Code, they create an environment where employees and individuals feel comfortable reporting potential violations without fear of retaliation.

#### **Enforce Accountability:**

Leaders must hold themselves and others accountable for upholding the Code by addressing any breaches promptly and taking appropriate disciplinary action when necessary. By doing so, leaders demonstrate that the code is non-negotiable and that violations will not be tolerated.

#### **Foster a Culture of Integrity:**

Fostering a culture of integrity within EnerMech involves promoting transparency, trust, and ethical decision-making. By creating an environment where ethical behaviour is valued and rewarded, leaders encourage employees to act with integrity.

#### **Continuously Evaluate and Improve:**

Leaders should regularly review and evaluate the effectiveness of the Code. They should seek feedback from employees and

stakeholders to identify areas for improvement to ensure that the Code remains relevant and aligned with evolving ethical standards.

### 3.2 Accountability

**At EnerMech, every individual within our organization, regardless of their role or level, must take responsibility for their actions and decisions. This commitment to accountability ensures that we maintain trust, integrity, and transparency in all our operations.**

#### **1. Personal Responsibility:**

Everyone is expected to take ownership of their work and behaviour. This means consistently performing duties to the best of their abilities, meeting deadlines, and adhering to company policies and procedures. By seeking feedback and learning from mistakes, we continuously improve performance.

#### **2. Holding Others Accountable:**

Managers and leaders play a critical role in fostering a culture of accountability by providing regular performance feedback and addressing any issues or misconduct promptly and fairly.

#### **3. Transparency and Honesty:**

Operating with transparency and honesty means being truthful in our communications, providing accurate information, and admitting when mistakes are made. Transparency builds trust with our employees, customers, stakeholders, and partners.

#### **4. Reporting and Addressing Issues:**

Everybody is encouraged to report any concerns, violations, or unethical behaviour they observe. Refer to the Speaking Up section for the channels for reporting such issues,

#### **5. Continuous Improvement:**

Accountability means being open to change and striving for continuous improvement by regularly reviewing our policies, procedures, and practices to ensure they remain effective and aligned with our values. Feedback from employees and stakeholders helps us identify areas for improvement.

#### **6. Consequences for Misconduct:**

There are clear consequences for failing to uphold the Code. This includes disciplinary action for unethical behaviour, non-compliance with policies, or any actions that harm EnerMech's reputation or operations.

### 3.3 Ethical Decision-Making

**Making good decisions matters. Use the Ethical Decision Guide (diagram below) to help you think through your decisions and make sure they fit with our company's values.**

Before making your decision, think of any possible unintended consequences or risks associated with the action. If you're confident the action promotes positive outcomes and aligns with company ethos, proceed. If not, consider alternative actions or seek further guidance.

Always seek help or advice when you are unsure. Your line manager, and the Legal and Compliance Department are here to help.

### 3.4 Speaking Up

**At EnerMech, we believe in conducting our business with honesty and integrity. We value the wellbeing of our employees, customers, and stakeholders, and strive to create a safe and ethical working environment. We encourage all individuals associated with EnerMech to speak up and report any wrongdoing or dangers related to our activities.**

#### Reporting Channels:

We have established multiple reporting channels to facilitate the process of speaking up. Individuals are encouraged to report any concerns, suspicions, or incidents of wrongdoing through the following channels:

#### Direct Supervisor:

Employees should feel comfortable and confident in approaching their immediate supervisor or manager to discuss any concerns they may have.

#### Human Resources Department:

Our HR department serves as a confidential and supportive resource for employees to report any issues or seek guidance on how to address them.

#### Speaking Up Hotline:

We maintain an anonymous reporting system, which includes a hotline and web or mobile application, to enable individuals to report concerns without fear of retaliation.

#### Open-Door Policy:

Employees are encouraged to approach any member of management, including senior leaders, to discuss concerns or potential wrongdoing.

#### Confidentiality and Anonymity:

We understand the importance of confidentiality when it comes to reporting sensitive information. We assure all individuals who speak up that their identities will be kept confidential to the maximum extent possible, and their anonymity will be respected if they choose not to disclose their identity.

#### Timely and Thorough Investigation:

Reports of wrongdoing or dangers will be taken seriously and promptly investigated. We are committed to conducting thorough, fair, and unbiased investigations to resolve reported concerns effectively. Where necessary, we will engage external experts to ensure impartiality and expertise in the investigative process.

For a deeper understanding and more specific guidance, please refer to the [Speaking Up Policy](#).

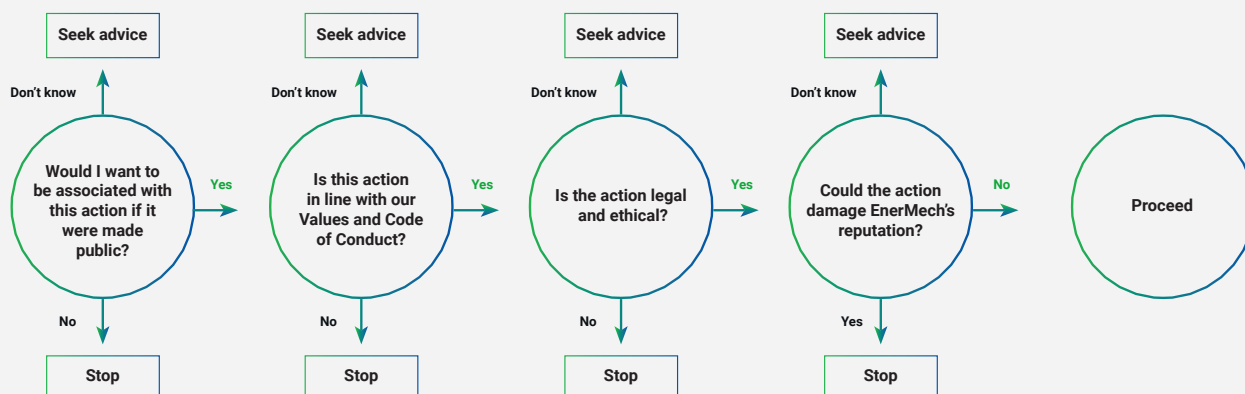
### 3.5 Non-Retaliation

**EnerMech strictly prohibits any form of retaliation against individuals who report concerns in good faith. Should anyone experience or witness retaliation, they should report it immediately through the same reporting channels mentioned above.**

We will take immediate action to address such instances and ensure the safety and wellbeing of all involved parties. By fostering a culture of speaking up, we continuously improve our business practices, mitigate risks, and maintain an environment of trust and transparency. Every individual within our organization has a responsibility to report any wrongdoing or dangers they come across, as we strongly believe that together, we can uphold the highest standards of honesty, integrity, and ethical conduct.

For a deeper understanding and more specific guidance, please refer to the non-retaliation section of the Speaking Up Policy.

#### Ethical Decision Guide





## 4.0 OUR PEOPLE



### 4.1 Introduction

**At EnerMech, our people are our greatest asset. We are committed to fostering a workplace where everyone feels respected, valued, and empowered to succeed. The way we treat each other directly reflects EnerMech's values and reputation.**

#### **We expect everyone to:**

##### **Act with Integrity and Respect:**

Treat colleagues, clients, and stakeholders with fairness, dignity, and inclusivity.

##### **Perform with Excellence:**

Strive to exceed expectations and continuously seek improvement.

##### **Communicate Openly:**

Promote clear communication to enhance collaboration and transparency.

##### **Be Accountable:**

Own your actions and learn from mistakes.

##### **Promote a Positive Workplace:**

Contribute to a safe, supportive environment that encourages wellbeing and teamwork.

### 4.2 Working Together

#### **4.2.1 Employee Practices and Equality**

We are committed to creating a safe, respectful workplace that promotes respect, diversity, and inclusivity. We believe that a harmonious work environment, free from harm and rich in mutual respect, is fundamental to our success and sustainability.

Safety at EnerMech is a shared responsibility. Every individual is accountable for the safety of themselves and the safety of their colleagues. This collective approach is encapsulated in our mantra, 'I am Safe, We are Safer', which underscores our intent to work as one team to prevent injuries and illnesses and to sustain the environment.

#### **4.2.2 Key Components of Working Together Safely**

##### **Safety Training and Education:**

Comprehensive safety training covering the latest safety practices and processes, as well as regular toolbox talks and safety moments, reinforces a continuous culture of safety awareness.

##### **Safety Leadership:**

Leaders play a critical role in promoting safety by leading by example, demonstrating safe behaviours, and fostering an environment where safety is prioritized.

##### **Health and Wellbeing Programs:**

Recognizing that employee health and wellbeing are integral to a safe work environment, we offer programs and resources that support physical and mental health. This includes access to wellness programs, mental health support, and initiatives that promote a healthy work-life balance.

#### **4.2.3 Creating and Maintaining a Respectful Workplace**

At EnerMech, we are committed to fostering a workplace environment that upholds our core values of Transparency, Passion, Collaboration, and Innovation. We believe that everyone deserves to work in an atmosphere that is respectful, inclusive, and free from discrimination or harassment. By adhering to the following principles, we can ensure a respectful workplace for all:

##### **Treat Others with Dignity and Respect:**

We expect everyone to treat colleagues, customers, clients, and partners with dignity and respect, regardless of their position, background, or personal characteristics. This includes maintaining a positive and professional manner in all interactions, both within and outside the organization.

##### **Embrace Diversity and Inclusion:**

We value diversity and recognize that different perspectives contribute to a more innovative and successful workplace. We actively promote diversity and inclusion by embracing individuals from various backgrounds, cultures, ethnicities, genders, ages, and abilities. Discrimination or harassment based on any of these characteristics is not tolerated.

**'I am Safe, We are Safer', underscores our intent to work as one team to prevent injuries and illnesses and to sustain the environment.**



**Zero Tolerance for Harassment:**

We have zero tolerance for any form of harassment, including but not limited to, sexual harassment, verbal abuse, bullying, or any behaviour that creates an intimidating, hostile, or offensive work environment. If you witness or experience any such behaviour, it is your responsibility to report it promptly to your manager, HR, or through our designated reporting channels.

**Open Communication and Active Listening:**

We encourage open and honest communication, where employees feel comfortable expressing their ideas, concerns, or grievances. We expect all employees to actively listen and engage in constructive dialogue, treating others' viewpoints with respect and empathy. We value effective communication as a means to foster understanding and collaboration.

**Confidentiality and Privacy:**

Respecting the confidentiality and privacy of our colleagues is crucial. We must not disclose or misuse any personal or sensitive information without proper authorization. It is important to handle such information with the utmost care and only share it on a need-to-know basis.

**Conflict Resolution:**

In the event of disagreements or conflicts, we encourage employees to seek resolution through peaceful and constructive means. Engaging in respectful dialogue, seeking mediation or involving HR, if necessary, can help find mutually beneficial solutions that align with our values.

**Continuous Learning and Improvement:**

We are committed to continuously improving our workplace culture and practices. This includes providing ongoing training and education on topics such as diversity, inclusion, unconscious bias, and respectful communication.

**4.2.4 Valuing Diversity and Inclusion**

We believe that embracing diversity and fostering inclusion is a key driver of our success. We are committed to cultivating an environment that celebrates and values the unique contributions and perspectives of every individual. By upholding our core values, we can create a diverse and inclusive workplace that benefits everyone:

**We Embrace Diversity:**

With over 50 nationalities in the business, we recognize that diversity encompasses a broad range of characteristics such as race, ethnicity, gender, age, religion, sexual orientation, physical abilities, and cultural background. We aim to create a workforce that reflects the diversity of the communities we serve and the global marketplace in which we operate.

**We Foster Inclusion:**

Inclusion means ensuring all individuals feel welcomed, respected, and valued. We cultivate a culture of participation, collaboration, and equal opportunities for growth, regardless of background or identity.

**We Encourage Respect:**

Employees are expected to treat one another with respect, appreciating the diverse perspectives that each individual brings. Discrimination, harassment, or any form of disrespectful behaviour based on an individual's characteristics or differences will not be tolerated.

**We Encourage Supplier Diversity:**

We recognize the value of supporting a diverse supplier base. We actively engage and partner with businesses owned by minorities, women, veterans, and other underrepresented groups to promote economic inclusion.

By valuing diversity and fostering inclusion, we can create a culture that attracts and retains top talent and also fuels innovation, enhances problem-solving capabilities, and strengthens our position as a socially responsible company.

**4.2.5 Equal Opportunities and Preventing Discrimination**

At EnerMech, we are fully committed to providing equal employment opportunities to all employees and applicants. Our hiring, promotion, and development decisions are based on qualifications, skills, and performance, without discrimination or bias.

We strive to ensure that our selection processes are fair, transparent, and inclusive. This means that all job openings are communicated to employees and applicants without any form of discrimination or preference.

We believe in treating people fairly, prohibiting discrimination in any aspect of employment including recruitment, hiring, compensation, benefits, promotions, transfers, and training opportunities. We are committed to providing an environment free from discrimination based on characteristics such as race, colour, religion, gender, sexual orientation, age, national origin, disability, or any other protected status.

We recognize the importance of providing appropriate accommodations to individuals with disabilities to enable them to perform their roles successfully. We are committed to complying with applicable laws and regulations regarding disability accommodation and ensuring that individuals with disabilities have equal opportunities for employment and advancement.

We strive for diverse representation at all levels of our organization, including leadership positions, believing that a diverse leadership team brings different perspectives, experiences, and ideas to the table, which enhances decision-making and drives innovation. By promoting these equal employment principles, we are not only complying with legal obligations but also creating a workplace environment where every individual has the opportunity to thrive and succeed.

**4.2.6 Communication**

Clear communication is a cornerstone of our Code of Business Conduct. It is essential for building trust, fostering collaboration, and ensuring that everyone within our organization understands and upholds our values and policies. By promoting transparency, accountability, and open dialogue, we strengthen relationships both internally and with external stakeholders. Prioritizing effective communication aligns our business practices with our values, contributing to the success and wellbeing of EnerMech and the communities we serve.

Effective communication helps maintain a positive and ethical work environment by preventing misunderstandings, conflicts, and unethical behaviour. By clearly conveying expectations, policies, and procedures, we foster a culture of transparency and accountability.



We encourage open and honest communication at all levels. Employees should feel comfortable sharing ideas, concerns, and feedback without fear of retribution. We believe that diverse perspectives drive innovation and growth, so we actively promote a culture of inclusivity and respect.

Our commitment to clear communication extends to external stakeholders, including customers, suppliers, investors, and the community. This means providing accurate and transparent information about our products, services, and business practices.

Clear communication is also essential in addressing any potential issues or conflicts. If a problem arises, we encourage all parties involved to engage in open and respectful dialogue to find a mutually beneficial solution, fostering stronger relationships and long-term partnerships.

## 4.3 Health and Safety

### Our Commitment to Health, Safety, and the Environment:

**We place the highest priority on the health and safety of our employees, contractors, customers, and the communities in which we operate. We are equally committed to protecting and preserving the environment. Our goal is to create a safe, healthy, and environmentally sustainable workplace where everyone takes personal responsibility for their actions.**

### Principles and Responsibilities

#### Safety

Safety drives our business decisions and actions, and every employee and contractor is responsible for adhering to safety protocols and guidelines.

#### Zero Harm Culture

We are committed to a Zero Harm culture. This means striving to eliminate incidents and injuries. We believe all accidents are preventable and work tirelessly to achieve this goal.

### Stop Work Authority

Every employee has the authority to stop any work that poses a threat to health, safety, or the environment. This policy ensures that safety is never compromised.

### Lifesaving Rules

Every employee has an obligation to work safely every day and ensure we have a safe working environment. Our nine Lifesaving Rules are part of the foundations of the EnerMech safety culture.

Rule 1: Risk assessment and control.

Rule 2: Verify isolations.

Rule 3: Working at heights.

Rule 4: Confined space.

Rule 5: Line of fire.

Rule 6: Safety barriers and signage.

Rule 7: Lifting operations.

Rule 8: Operating vehicles/equipment

Rule 9: Fit for duty.

Every employee has a personal responsibility to follow these rules.

### Environmental Stewardship

We are dedicated to reducing our environmental impact. This includes minimising waste, conserving resources, and preventing pollution through innovative practices and technologies.

### Continuous Improvement

We set measurable objectives and continually assess our performance to identify areas for improvement. Our commitment to sustainability is reflected in our ongoing efforts to enhance our processes and reduce our environmental impact.

By embedding these principles into every aspect of our operations, EnerMech ensures a workplace where health, safety, and the environment are part of our success.

### Lifesaving Rules



## 4.4 Quality and Innovation

EnerMech is dedicated to meeting the requirements of both its external customers and internal stakeholders. This dedication is outlined in our [Quality Policy Statement](#) and reinforced by our alignment with, and certification to, the ISO 9001 Quality Management Standard.

Our Quality Management System (QMS) is designed to deliver predictable outcomes by reducing variability within our processes, ensuring that all stakeholders in EnerMech's service delivery receive consistently high-quality results.

**In line with our Quality Policy, EnerMech is fully committed to:**

- Implementing a client satisfaction program to better understand customer needs and expectations.
- Applying a 'zero-defect' mindset throughout the organization, ensuring we provide products and services of the highest standard to our clients and partners.
- Establishing and reviewing quality objectives annually to demonstrate our dedication to continual improvement.
- Evaluating, measuring, and monitoring performance to ensure regulatory, compliance, and stakeholder requirements are met.
- Identifying and assessing risks and opportunities while managing them effectively, considering the interests of all relevant parties.
- Empowering personnel to intervene to prevent non-conformities and implement appropriate solutions.
- Providing information, instruction, and training relevant to individual roles and responsibilities.
- Encouraging employee participation and consultation on Quality System issues and opportunities for improvement.
- Fostering a learning culture to drive continual improvement in systems and processes.
- Developing innovative methods to support the transition to a sustainable and carbon-neutral business.

The Senior Leadership Team is committed to establishing, implementing, and maintaining the Management System. All employees are responsible for compliance to the operations controls stated in the management system.

### Innovation

As a leader in delivering innovative solutions into the industries in which we operate, we thrive on new ideas, processes, and practices that bring value, competitive advantage, or improved efficiency and productivity to our business. We encourage all personnel to bring new thoughts to support and assist in the innovative development of our business.

## 4.5 Counterfeit, Fraudulent, and Suspect Items

EnerMech recognizes the risks associated with Counterfeit, Fraudulent and Suspect Items (CFSI), and the potential impact on our customers. To mitigate these risks, we implemented a number of processes to safeguard our customers and our reputation. We only use materials and components that conform to agreed specifications and that are approved under our Quality Management System. For further information, consult the [CFSI Policy Statement](#).





## 5.0 OUR WORKING PRACTICES

REGULATION

LAW

COMPLIANCE

### 5.1 Introduction

#### Our Working Practices: Upholding Standards Every Day

At EnerMech, how we work is as crucial as the work itself. We expect all employees to uphold high standards of professionalism, ethics, and accountability in their daily tasks by:

- **Adhering to Company Policies:** Aligning actions with the Code, company policies, and legal requirements.
- **Making Ethical Decisions:** Acting with integrity to reflect our values and uphold our reputation.
- **Collaborating Effectively:** Fostering teamwork and clear communication.
- **Prioritizing Safety and Quality:** Ensuring safety and high-quality performance in everything you do.

Through these practices, we achieve our business goals while upholding the highest standards of ethics and professionalism.

### 5.2 Anti-Bribery and Corruption

#### Integrity First:

EnerMech is unwavering in its dedication to upholding the highest standards of integrity. We proudly stand against bribery and corruption, ensuring every business move aligns with our values and all applicable local laws.

#### Mandatory Guidelines for Ethical Conduct:

- **Avoid Corruption:** Never engage in corrupt activities, directly or indirectly, and familiarize yourself with the signs and symptoms of corruption using the training materials EnerMech provides.
- **Reject Bribes:** Refuse all forms of bribes, including gifts, entertainment, employment offers, contracts, or any benefits intended to influence decisions or gain unfair advantages.
- **Partner Ethically:** Ensure third parties – agents, representatives, joint ventures – adhere to our [Supplier Code of Business Conduct](#), undergo thorough due diligence, and align with our commitment to ethics.
- **Speak Up:** Use the [Speak Up Policy](#) to report any suspected corrupt activities without fear of retaliation.
- **Understand the Consequences:** Violating anti-bribery laws such as the UK's Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA) 1977 carries severe penalties. Companies can face unlimited fines, and individuals face heavy fines, imprisonment for up to 10 years, and significant damage to personal and professional reputation.

#### Staying Informed:

Laws against bribery and corruption vary by region. EnerMech adheres to the UK's Bribery Act 2010 and the US Foreign Corrupt Practices Act (FCPA) 1977 as well as all other applicable anti-bribery laws.

Your actions echo the voice of EnerMech. Let's ensure it's a voice of trust, integrity, and ethical conduct. For more detailed guidance on our position, the [Anti-Bribery & Corruption Policy](#) is available on the EnerMech Document Library, and we encourage you to familiarize yourself with this at regular intervals.

### 5.3 Working with Governments

#### Understanding the Landscape:

Engaging with government officials is integral to our business, requiring the highest levels of integrity and transparency. These interactions often go beyond typical business protocols, demanding adherence to both domestic and international laws.

#### Definition:

*"A Government Employee/Official is any person holding an office or employed in the service of an executive, legislative, or administrative body at a federal, national, state, or local level, irrespective of the country. This encompasses staff from public agencies/ departments, state institutions, or state-owned enterprises, including state-owned oil companies."*

#### Why Careful Engagement Matters:

Governments, as representatives of the public, are bound by rules to ensure fairness, transparency, and protection of public interests. As partners in their endeavours, we are also entrusted with the responsibility of upholding these values. Upholding these values in our interactions helps protect our reputation and fosters long-term trust.

#### Guidelines for Interaction:

- **Boundaries:** Never offer or promise personal benefits or anything of value, directly or indirectly, to government officials unless it aligns with applicable laws, regulations and our Code.
- **Accuracy and Honesty:** Ensure all documents, proposals, and communications are precise, truthful, and transparent.
- **Compliance:** Familiarize yourself with all laws, regulations, and special requirements when working with government bodies.

- **Avoid Unauthorized Information:** Do not seek, accept, or use unauthorized or confidential information from competitors or related to government selection processes.
- **Professional Integrity:** Maintain integrity when handling government solicitations, or classified information.

#### Seeking Clarification:

If you are ever in doubt, contact the Legal and Compliance Department or your line manager. Understanding and following these guidelines ensures trust and mutual respect in our government interactions.

## 5.4 Gifts, Hospitality, and Entertainment

**Our business relationships thrive on trust, transparency, and mutual respect. While gifts, hospitality, and entertainment often serve as symbols of goodwill, they must not undermine our commitment to ethical behaviour or appear as an attempt to unduly influence decisions.**

#### Guiding Principles:

- **Context Matters:** Gifts, hospitality, and entertainment should align with our values and cultural norms. What's accepted in one region might be inappropriate or even illegal in another.
- **Always Act Transparently:** Ensure all exchanges are reasonable in value, frequency, and context, supported by genuine receipts, and accurately recorded.
- **Exercise Special Care with Officials:** Regulations for gifts, hospitality, and entertainment to government officials tend to be much stricter. It's our responsibility to know these rules and follow them rigorously.
- **Avoid Timing Conflicts:** During negotiations or tenders, refrain from gift exchanges to avoid perceived bias.
- **Record and Review:** All gifts and hospitalities given or received must be properly documented to maintain transparency and facilitate regular compliance checks
- **Consult if Unsure:** refer to our [Gifts & Hospitality Policy](#) for guidance on what's acceptable and what's not. You can find this policy and other related resources on the Ethics and Compliance page on the Hub (link).

Remember, Gifts, hospitality, and entertainment should never be used to gain an improper advantage. They must reflect our commitment to ethical conduct and company values.

## 5.5 Conflicts of Interest

**EnerMech's commitment to impartiality and fairness is fundamental to our operations and stakeholders' trust. Personal interests must not interfere with our professional responsibilities or compromise our reputation. Your diligence in managing potential conflicts of interest safeguards EnerMech's reputation.**

#### Safeguarding EnerMech's integrity is a collective endeavour. Here's what it entails:

- **Prioritize the Company:** Always act in EnerMech's best interest, ensuring your personal interests do not compromise our values or reputation.
- **Stay Informed:** Review the [Conflicts of Interest Policy](#) for guidance on avoiding conflicts.
- **Be Transparent:** Potential conflicts aren't necessarily an issue unless concealed. When in doubt, raise it.
- **Act Immediately:** If you identify a conflict, report it to your team leader, HR, or Compliance for timely resolution.

For further guidance, consult the [Conflicts of Interest Policy](#) and refer to the register on the Ethics and Compliance Hub.

## 5.6 Political and Charitable Donations

#### Political Donations

EnerMech maintains strict neutrality by prohibiting the use of funds and resources contributions to political parties or candidates. Individuals are free to make their own choices in their personal capacity, but these decisions must be kept separate from EnerMech's operations.

#### Charitable Contributions

EnerMech believes in giving back to the community, but all charitable donations made on behalf of the company must have approval from our CEO. For a charitable donation to be approved, it must:

- Be reasonable in value, quantity, and frequency.
- Comply with all relevant laws.
- Align with our Code.
- Be accurately recorded.

Employees are free to make personal charitable donations without influence from EnerMech. Given potential conflicts of interest, all employees should review our [Conflict of Interest Policy](#) for further guidance.

## 5.7 Human Rights, Modern Slavery, and Human Trafficking

**Every individual deserves to be treated with dignity, fairness, and respect. At EnerMech we uphold these human rights across our operations and beyond, from our immediate teams to our expansive supply chain and the communities we engage with.**

#### Your responsibilities include:

- Treating colleagues, suppliers, and communities with respect and in line with our values.
- Refusing to exploit or condone exploitation, including forced or child labour, and working only with partners who share our stance.
- Strictly adhering to all local and international laws on fair labour practices, including wage and hour regulations.
- Ensuring vigilance in preventing human trafficking and modern slavery across all operations and supply chains.

Our commitment to human rights is a fundamental pillar of our corporate identity and a guiding principle in every decision we make. For more information, refer to the [Modern Slavery, and Human Trafficking Policy](#).

## 5.8 Sanctions, Import, and Export Controls, and Trade Compliance

#### Understanding the Landscape:

As a global business we navigate complex trade regulations, including export controls, sanctions, and anti-boycott laws. These are essential to maintaining our reputation for integrity and upholding our commitment to lawful business conduct.

#### Our Commitment:

We strictly adhere to all trade laws, ensuring our products, technology, and information do not cross borders in violation of import/export laws. We respect economic sanctions, avoid dealings with sanctioned entities, and comply with anti-boycott regulations.



### Your Role:

If your role involves international dealings — whether through logistics, transferring technical information, or collaborating on projects — it's crucial that you familiarize yourself with these regulations.

### Before making decisions or taking actions in this space:

- Ensure you understand the impact of sharing equipment, technology, or information to third parties, especially where there is a cross-border element.
- Seek prior written approval where you are unsure of the trade regulations.
- Consult our [Sanctions, Import, and Export Policy](#) on the EnerMech Document Library for more guidance.

### Seek Guidance:

Trade regulations can be intricate. When in doubt, contact the Legal and Compliance Department for support. Non-compliance with these regulations not only jeopardizes our company's reputation but may also lead to severe financial and legal consequences. Always act with caution.

## 5.9 Competition and Anti-Trust

**Our success is built on fair competition and ethical standards. The competitive spirit drives us, and we strive for excellence while competing honourably and in full compliance with the law.**

### Why Integrity Matters in Competition:

Our commitment to a free, competitive market distinguishes our brand. Transparent practices and adherence to antitrust laws foster customer trust and loyalty. Violations carry serious legal and reputational risks.

### Guidelines for Upholding Fair Competition:

#### We ensure integrity by:

- Avoiding agreements that set prices, manipulate bids, or divide markets.
- Clearly and accurately presenting our offerings.
- Refraining from disrupting customers' existing contracts.
- Acquiring competitor information only through ethical and legal means.

### Seeking Guidance:

Competition laws vary by region. For any uncertainties, consult the Legal and Compliance Department. Our reputation rests on the actions of each team member.

## 5.10 Financial Crime

### 5.20.1 Money Laundering, Tax Evasion, and Terrorist Financing

At EnerMech we are dedicated to ethical business practices, including a zero-tolerance stance against money laundering and terrorism financing. Our commitment to integrity means we go beyond compliance with local laws to exceed global standards.

#### What Does This Mean in Practice?

- **Stay Vigilant:** Unusual transactions or those involving unknown parties, should immediately raise flags. This includes payments that:
  - Deviate from the agreed invoice terms.
  - Are channelled through unconventional business routes such as the use of shell companies, anonymized and cryptocurrency transactions or include cash.
  - Originate from or are directed to jurisdictions unrelated to the transaction.

- Come from third parties not connected to the contract.
- **Understand the warning signs:** Learn to recognize indicators of money laundering and potential tax evasion. If something doesn't seem right, it probably isn't.
- **Speak Up:** Immediately contact the Legal and Compliance Department if you spot suspicious activity.
- **Training and Resources:** We empower staff through regular training and resources, ensuring everyone contributes to EnerMech's integrity.

Together, we ensure EnerMech remains a trusted and ethical leader in the global marketplace.

### 5.10.2 Fraud

Integrity is paramount, and we maintain a firm stance against all forms of fraudulent behaviour. Protecting our ethical reputation is essential not only for compliance but also to uphold the trust of our stakeholders'.

#### Personal Accountability:

Everyone at EnerMech has a pivotal role to play in maintaining EnerMech's firm stance against all forms of fraudulent behaviour. It's essential to recognize and stay alert to potential red flags.

#### Examples of Prohibited Conduct:

Fraud can take many forms, including:

- Deliberate deceit or misrepresentation for personal gain.
- Unauthorized acquisition, use or misuse of company, client, or partner assets, including financial resources or equipment.
- Manipulation or falsification of company records or financial documents.
- Exploiting one's position for personal benefits or unauthorized purchases.

#### Take Action:

Awareness is the first line of defence. If you detect or suspect any fraudulent activity, Speak Up and contact the Legal and Compliance Department.

### 5.10.3 Financial Integrity and Transparency

#### Our Commitment:

Maintaining accurate and transparent financial records is essential to EnerMech's credibility and success. Transparent record-keeping fosters trust among our investors, partners, customers, and community.

#### Your Role in Preserving Integrity:

Everyone contributes to financial transparency by:

- Accurately and truthfully recording all business transactions in real-time.
- Adhering to globally recognized accounting principles and our internal protocols.
- Ensuring no hidden funds or undisclosed assets exist.
- Using precise language in all records.
- Retaining necessary documents and following our [document retention policies](#).

#### Stay Vigilant:

If you notice any discrepancies or questionable accounting or financial entries, contact the Legal and Compliance Department immediately.

# 6.0 OUR INFORMATION



## 6.1 Information Security

EnerMech personnel are required to maintain strict confidentiality and safeguard proprietary information, whether it pertains to EnerMech, our suppliers, customers, or third parties. Unauthorized disclosure, intentional or accidental, could significantly harm our business. Proprietary information includes but is not limited to:

- **Technical Information:** Manufacturing processes, engineering designs, and drawings, software code, know-how, patents, trademarks, and copyright.
- **Private Business Information:** Financial data, employee information, analysis, forecasts, pricing, strategy, legal opinions, audits, and proposed transactions.

If your role requires discussing proprietary information with external parties (such as during contract negotiations) a written confidentiality or non-disclosure agreement must be in place. The Legal Department can provide these agreements.

### Guidelines for handling proprietary information:

Do not disclose confidential information without prior authorization from your line manager. Avoid obtaining proprietary information through unethical means (e.g., deception or bribery) or using another entity's information without permission. If you encounter sensitive information accidentally, secure it immediately and prevent further disclosure. When in doubt, discuss with your line manager before sharing details. Exceptions: Disclosure is only permitted when authorized by the company or when legally required. Any such requirements should first be discussed with the EnerMech Legal Department.

## 6.2 Third-Party IP

EnerMech respects the intellectual property rights of all third parties and is dedicated to operating without infringing or unlawfully using others' intellectual property. We uphold the creative and innovative contributions of other companies and individuals with the same respect we expect for our own.

## 6.3 Improper Use of IT Systems

EnerMech is committed to a secure and ethical IT environment. All employees must use IT systems responsibly, as any misuse can impact both EnerMech and the individuals involved.

### Compliance with this Code is mandatory:

- **Keep your account secure** – You are responsible for any activity linked to your IT accounts. Do not share your passwords or let others use your accounts.
- **Use IT systems for business purposes** – Personal use of IT accounts should be minimal. Do not access services on EnerMech equipment that are inappropriate for the workplace.
- **Look after equipment** – Keep IT equipment secure and well maintained. Report any loss or theft immediately to [servicedesk@enermech.com](mailto:servicedesk@enermech.com).
- **Do not modify IT systems** – Avoid making unauthorized IT system changes or installing unapproved software. Use the Company Portal for approved apps or request support.
- **Protect EnerMech's data** – Share data only on a 'need to know' basis for legitimate business purposes. Do not store or transfer data to non-EnerMech systems unless necessary for business (e.g., with a client or supplier).
- **Be respectful** – Do not access websites or data on EnerMech systems that could be deemed inappropriate at work or damage the company's reputation. Maintain professionalism in all IT communications.
- **Defend IT security** – Report data breaches, phishing emails, or any suspicious activity promptly to [servicedesk@enermech.com](mailto:servicedesk@enermech.com) (or via phishing report tools).

Further information can be found in the [Acceptable Use Policy](#) which is available on SharePoint. Adhering to these guidelines pertaining to responsible IT system use will result in a safe and secure work environment aligned with EnerMech's values.

## 6.4 Social Media

The Code extends to social media use, as actions on these platforms can impact EnerMech's reputation. In today's digital age, social media platforms have become powerful tools for communication and networking. It is important that everyone understands that their actions on social media can reflect on EnerMech's reputation.

Here are some key guidelines regarding social media usage:

- **Confidentiality:** Avoid sharing company-sensitive or proprietary information.
- **Professionalism:** Maintain a professional and respectful tone, avoiding offensive, discriminatory, or inflammatory language or content.



- **Respect for Others:** Respect privacy and avoid cyberbullying, harassment, or any misconduct.
- **Personal vs. Professional:** Distinguish between personal views and those that may be interpreted as representing EnerMech.
- **Brand Representation:** Be mindful that online actions may reflect on EnerMech's reputation; avoid any potentially harmful activity.
- **Compliance with Laws and Regulations:** Adhere to laws, regulations, and company policies, including those around intellectual property, privacy, and advertising.

For more detailed guidance, consult the [Social Media Policy](#).

## 6.5 Cyber Security

Cyber security is critical to protecting our business, employees, and customers. At EnerMech, we all have a role in maintaining a secure environment by staying vigilant and completing regular cyber security training. Key guidelines for minimising cyber risks include:

- **Information Security:** Protect sensitive information (e.g., customer data, intellectual property) using encryption, strong passwords, and secure storage. Be alert to phishing attempts, scams, and suspicious websites, and report them immediately.
- **System Access and Controls:** Ensure only authorized personnel have access to systems. Regularly review user access, disable accounts when needed, and maintain strong, unique passwords with multi-factor authentication.
- **Network Security:** Use secure Wi-Fi and VPN connections, avoid untrusted networks, and apply encryption. Update software regularly to close security vulnerabilities.
- **Incident Reporting:** Report any suspected security incidents (data breaches, unauthorized access, malware) to IT or designated authorities without delay.
- **Training and Awareness:** Complete all required training modules to stay informed on cyber threats, particularly phishing and social engineering. Share insights to encourage a culture of cyber security awareness.

### Safeguarding our Digital assets

Protecting confidential information and proprietary software is crucial to maintaining our competitive edge and our clients' trust.

Every member of the EnerMech team plays a role in the safeguarding process:

- **Ethical Use:** Use company technology — computers, email, software, and networks — ethically and responsibly. Limited personal use is permitted, but it must never compromise our digital security.
- **Official Communications:** Conduct all business communications through official channels. Company email is both a professional and security measure.
- **Stay Vigilant:** Avoid accessing, storing, or sharing materials that may be inappropriate, discriminatory, or harmful, maintaining a safe and respectful digital workspace.
- **Protect and Respect:** Keep passwords secure, protect unattended devices, and observe copyright and legal restrictions when downloading or sharing content.
- **Reporting Concerns:** Report suspicious activity or potential breaches immediately — proactive reporting is essential to maintaining our security.

Our Information Technology systems may be monitored under applicable legal parameters to ensure safety and foster vigilance.

## 6.6 Responsible use of AI

At EnerMech, we embrace the innovative potential of technology to enhance our operations and decision-making processes. With innovation comes a responsibility to ensure that 'artificial Intelligence' (AI) is used ethically and in alignment with our values of fairness, transparency, and accountability.

### Responsible AI use means:

- **Ethical AI Application:** AI use must align with EnerMech's ethical standards, avoiding biased or discriminatory outcomes and upholding individual rights and privacy.
- **Transparency and Accountability:** Employees must maintain transparency in AI usage and to be accountable for any decisions made through AI tools. This includes ensuring that AI-driven decisions can be understood, explained, and justified.
- **Privacy, Confidentiality, and Data Protection:** Adhere strictly to data protection regulations, keeping confidential company information out of external AI systems, unless approved by the Legal and Compliance Department and the IT Department.
- **Alignment with Company Values:** The use of AI must align with EnerMech's values and business objectives. Employees should seek guidance when unsure about the ethical implications of AI and are encouraged to report any concerns about misuse.

By adhering to these principles, we ensure AI use at EnerMech supports our commitment to ethics and integrity.

## 6.7 Risk Management

Effective risk management is a shared responsibility across EnerMech. Identifying and mitigating risks before they escalate is key to protecting our assets, reputation, and people. By fostering a culture of vigilance, accountability, and informed decision-making, we ensure risk management is integrated into all aspects of our work.

### 6.7.1 Scope of Risks

Risks may include:

- **Operational Risks:** Challenges impacting safe and efficient service delivery, especially in high-risk environments.
- **Financial Risks:** Threats to financial performance, including budgeting and resource management.
- **Legal Risks:** Potential for legal, regulatory, or contractual breaches.
- **Reputational Risks:** Actions or events that could harm our standing with stakeholders.
- **Safety Risks:** Ensuring the health and wellbeing of our employees and others, particularly in high-risk operational environments.

### 6.7.2 Shared Responsibility

Every employee plays a role in identifying risks in their work. While certain risks may be specific to functions like finance or legal, each team member is responsible for avoiding actions that could escalate any risks, particularly those related to safety.

### 6.7.3 Reporting and Escalation

Prompt reporting of identified risks is essential. Depending on the nature of the risk, notify your line manager or relevant department (e.g., Finance, Legal, Health and Safety). Confidential reporting through the [Speaking Up](#) channel is also available for sensitive concerns.

#### 6.7.4 Completing Training

Completing all required training, including Code of Business Conduct training, equips employees to identify and manage risks effectively. Staying current with training schedules strengthens our collective vigilance.

By adopting these practices, we maintain a proactive risk management culture, protecting EnerMech's future and supporting safe, responsible operations across all areas.

### 6.8 Contract Authorization

To protect EnerMech against legal and financial risks, all contracts must be reviewed and authorized according to the Authority Matrix.

#### 6.8.1 Authorization and Approval

EnerMech's Authority Matrix specifies who can review and sign contracts, based on contract size, type, and risk. Employees involved in contract processes must verify they have the correct authorization per the latest Matrix, which is updated regularly.

Contracts must be properly reviewed by relevant departments, including Legal and Finance when required. Only authorized individuals, as indicated in the Authority Matrix, should sign contracts to ensure compliance.

### 6.9 Employee Data Privacy

EnerMech is committed to safeguarding the privacy of employee personal data. EnerMech goes to great lengths to ensure that personal data is kept confidential and secure. Only authorized personnel have access to this information with robust measures to prevent unauthorized access or data loss. When it comes to collecting and using employee data, we always do so for lawful purposes and in compliance with data protection laws. We only collect the necessary information for the employment relationship, and we make sure to inform employees about why we're collecting their data and what their rights are.

Getting informed consent is a top priority for us. We want our employees to be fully aware of how their personal data is being collected, processed, and used. We provide clear and transparent information about our data collection practices, including any sharing with third parties.

Responsibly managing data retention is another key aspect of our approach. We only keep employee data for as long as we need it, in compliance with retention requirements. Once it's no longer necessary, we securely dispose of it to prevent any unauthorized access.

Respecting our employees' rights is fundamental. We recognize their right to access, correct, and update their personal data. Whenever an employee makes a request related to their data, we handle it promptly and in accordance with data protection laws.

By adhering to this Code, we ensure that we handle our employees' personal data responsibly, respecting their privacy, and abiding by all relevant laws and regulations. For more information, refer to the [Data Protection Policy](#) here.

### 6.10 Facility Safeguarding: Preserving Our Assets and Reputation

Our facilities are more than just buildings; they represent our dedication and commitment to quality service for our employees and customers. Securing these spaces protects our assets, reputation, and the values we stand for.

#### Safeguarding Protocols

To ensure security and functionality of our spaces, we follow strict safeguarding measures:

- **ID and Access:** Display your pass visibly, keep keys, badges, and codes secure and avoid holding doors open or permitting unidentified individuals to tailgate behind you.
- **Lock Up:** Secure all offices, storage areas, and company vehicles when not in use.
- **Report Issues:** Immediately report any facility issues such as leaks or malfunctioning equipment.
- **Routine Checks:** Regularly inspect safety and security devices to confirm they're fully functional.
- **Always be Alert:** Be on the lookout for unidentified individuals and seek help if you see someone acting out of place. Any alarms demand immediate attention.

In case of immediate threats, always prioritize safety. If there's an immediate threat to you or our facilities, contact emergency responders once you are secure.





# 7.0 STAKEHOLDERS



## 7.1 Introduction

EnerMech's success is built on strong, ethical relationships with our stakeholders, including customers, suppliers, partners, and the communities we serve. We expect all employees to engage these parties with professionalism, transparency, and integrity.

When engaging with stakeholders, employees should:

- **Act in the Best Interests of Shareholders:** Make decisions with the long-term success of the company and its shareholders in mind, in line with applicable laws and regulations. This includes considering the impact of our actions on employees, communities, the environment, and EnerMech's reputation.
- **Foster Trust and Transparency:** Communicate openly and honestly with external parties to build lasting trust.
- **Promote Ethical Practices:** Uphold the highest ethical standards in all interactions, reflecting our commitment to fairness, respect, and sustainability.

By adhering to these principles, we ensure that our interactions with stakeholders contribute to sustainable, positive outcomes for everyone involved.

## 7.2 Putting Customers First

Our customers are the driving force behind our pursuit of excellence. By actively listening to their needs, feedback, and concerns, we can adapt, evolve, and better align our offerings. These dynamic relationships ensure we're always in step with their changing demands.

## 7.3 Engaging with Partners, Agents, and Business Representatives

EnerMech collaborates with a range of third parties, including agents, local content partners, and freight and logistics forwarders, who each play a crucial role in supporting our global operations. Even though they operate at a distance from us, their behaviour directly impacts our reputation and business.

We understand that they are important in helping us maintain our global reach and ensure that our interactions with these third parties align with our ethical expectations.

Our Approach to Third-Party Collaborations:

- **Reputable Relationships:** We prioritize partnering with third parties known for their professionalism and ethical conduct.
- **Adherence to Our Supplier Code of Business Conduct:** All third parties must adhere to our Supplier Code of Business Conduct.
- **Thorough Onboarding:** Our onboarding process is detailed and rigorous, ensuring that every partner aligns with our values and compliance standards. To become part of our extended team, third parties must complete comprehensive questionnaires such as the Business Partner and Service Provider Questionnaire and Supplier Evaluation Questionnaire. These documents gather essential information, including ownership and management, financial transparency, QHSE standards, and anti-corruption controls, as well as modern slavery practices. Only those who resonate with our values become part of our extended team.
- **Rigorous Due Diligence:** Every potential partner undergoes an in-depth due diligence process to ensure alignment with our standards. This includes third-party reports covering areas beyond our internal reach — such as legal records, litigation history, reputation, and identity verification. We then screen partners against international sanctions lists using a specialized watch list tool to identify potential risks. Any significant findings are escalated to leadership, and if needed, appropriate contractual provisions are implemented to address identified risks. This comprehensive approach reinforces our commitment to partnering only with entities that reflect our high standards.

## 7.4 Supplier Relationships

### Commitment to Lawful and Ethical Conduct

At EnerMech, we engage only with suppliers who share our commitment to lawful and ethical conduct. We require all suppliers and intermediaries to comply with applicable laws and our stringent due diligence standards. This is non-negotiable and is the foundation to fostering trust and achieving operational excellence.

### Cultivating Partnerships

Our approach to supplier selection emphasizes building relationships grounded in mutual respect, shared goals, and long-term benefits, aimed at delivering exceptional customer experiences and innovative solutions.



## Principles of Our Selection Process

EnerMech is dedicated to:

- Ensuring fairness and objectivity in supplier selection to bolster our competitive advantage and enhance customer satisfaction.
- Building a supply chain aligned with our values of passion, collaboration, innovation, and respect.
- Strictly adhering to international compliance standards such as the US Procurement Integrity Act and the Foreign Corrupt Practices Act.
- Conducting comprehensive supplier evaluations to verify ethical and legal standards, along with their credentials and reputation, to uphold our commitment to quality.
- Basing selection on clear performance metrics, including product excellence, ethical practices and prompt delivery.
- Encouraging diversity and inclusivity, valuing varied perspectives and expertise.
- Preventing conflicts of interest by ensuring an unbiased selection process.
- Refusing inducements that could compromise the integrity of our procurement decisions.

## 7.5 Community

At EnerMech, we understand that our success as a business is closely linked to the prosperity of the communities we serve. As a result, we strive to go beyond mere profitability and actively contribute to the wider society.

- **Sustainability:** We are committed to reducing our carbon footprint by adopting environmentally friendly technologies, conserving energy, and minimising waste to preserve resources for current and future generations.
- **Social Responsibility:** We promote an inclusive and diverse workplace that respects all individuals. We strictly prohibit discrimination and ensure equal opportunities, fostering an environment where everyone can thrive.
- **Community Engagement:** Our dedication extends to active charitable and volunteer efforts. We collaborate with local organizations to support good causes and strive to enhance the overall quality of life in the communities we operate in.
- **Transparency and Integrity:** Conduct business with openness, keeping stakeholders informed about our operations and their impact. We are committed to ethical conduct, adhering to all laws and fostering a culture of honesty, fairness, and accountability.

Our Code embodies these values, guiding our actions and relationships with stakeholders. By prioritizing sustainability, social responsibility, community engagement, and integrity, we strive to create a positive, lasting impact within the communities we serve and contribute to a better future for all.





## 8.0 RESOURCES



### 8.1 Further Information and Support

Our Code of Business Conduct stands as a testament to our commitment to ethical business practices and serves as a compass for our daily operations. We recognize however, that the complexities of our industry means our Code cannot cover every scenario you may encounter.

#### Points of Contact

Should you find yourself facing an ethical dilemma, in need of advice, or if you have questions about applying the Code in real-world situations, do not hesitate to reach out.

Our Compliance team is your dedicated resource, offering support and confidentiality when you report incidents, seek help on emerging issues, or require further understanding of our Code.

- Compliance: [compliance@enermech.com](mailto:compliance@enermech.com)
- Legal: [legal@enermech.com](mailto:legal@enermech.com)
- Human Resources: [hr@enermech.com](mailto:hr@enermech.com)
- Communications: [communications@enermech.com](mailto:communications@enermech.com)
- Corporate Headquarters:  
EnerMech House  
Howes Road  
Aberdeen  
AB16 7AG  
United Kingdom

#### The EnerMech Ethos

Remember, at EnerMech, you are never alone in your pursuit to uphold our values. We are a collective and together, we want to make a meaningful impact in our industry. Our resources, like our people, are here to empower you to embody the principles that have made us who we today: a leader forging a secure, sustainable, and viable future.

