SGA TECHNOLOGIES LTD & SGA POOLE LTD – ETHICS POLICY

(Updated November 2025)

Code of Conduct for Service Providers

This Code of Conduct outlines the legal and ethical business standards expected from all Service Providers of SGA Technologies and SGA Poole. It serves as a practical guide to help ensure compliance with our company's standards and should be kept accessible for regular reference. Familiarize yourself with its contents to align your business practices with the expectations of SGA Technologies and SGA Poole.

FOREWORD

At SGA Technologies and SGA Poole, we are committed to conducting our business with the highest ethical standards and in full compliance with all UK laws and regulations. These principles are the foundation of how we operate, and we expect the same level of commitment from our suppliers, contractors, and representatives.

A strong reputation is hard-earned, easily lost, and difficult to rebuild. It is crucial that we remain vigilant in upholding our ethical standards. Together, we have the capability to lead in our market segments, and we rely on your integrity, dedication, and adherence to this Code of Conduct to maintain our position.

Thank you for your commitment to fostering an ethical business environment.

Christopher Brown

Managing Director, SGA Technologies Limited

Date: 5/1/26

Robert Rhodes

Managing Director, SGA Poole Limited

Date: 12-1-26

INTRODUCTION

SGA Technologies and SGA Poole are dedicated to maintaining the highest standards of ethics and compliance with all applicable UK laws and regulations. This Ethics Policy governs our own conduct, and we require the same high standards from all suppliers, contractors, agents, consultants, representatives, and distributors (collectively referred to as "Service Providers").

By conducting business with or on behalf of SGA Technologies and/or SGA Poole, all Service Providers share the responsibility to uphold ethical and lawful business practices. This Code also aligns with the principles of the UK Corporate Governance Code, the Modern Slavery Act 2015, the UK Bribery Act 2010, and other relevant UK and international standards on ethical business conduct.

BUSINESS PRACTICE REQUIREMENTS

Compliance with Laws, Regulations, and Contracts All Service Providers must comply with applicable UK laws and regulations relevant to their business activities, employees, and operations. Furthermore, Service Providers must adhere to the terms, conditions, and provisions specified in their contracts with SGA Technologies and/or SGA Poole. This includes compliance with data protection, human rights, environmental, and export control legislation, as well as local and international trade sanctions.

No Bribery or Money Laundering

SGA Technologies and SGA Poole maintain a zero-tolerance policy toward bribery, corruption, and other forms of financial misconduct. Our policy strictly prohibits any form of corruption, bribery, extortion, embezzlement, or money laundering. Service Providers must also ensure compliance with the UK Bribery Act 2010 and must have adequate anti-bribery procedures in place. Facilitation payments, kickbacks, and improper gifts are strictly prohibited.

No Discrimination, Harassment, or Victimisation

Service Providers must not engage in discriminatory hiring or employment practices based on race, national origin, gender, age, sexual orientation, citizenship, marital status, disability, or religion. All Service Providers must also comply with the Equality Act 2010, ensuring a workplace free from harassment, bullying, and victimisation.

Employment Practices

Service Providers must comply with all relevant employment laws and regulations, including those related to minimum wage, maximum work hours, overtime, and benefits. They must employ only individuals who meet the minimum legal working age as stipulated by applicable laws and regulations. Fair pay, diversity, and inclusion must be actively promoted, and employment decisions should be based on merit, competence, and qualifications.

No Forced Labour, Slavery, or Human Trafficking

Service Providers must not engage in, facilitate, or tolerate any form of forced or involuntary labour, slavery, or human trafficking. Compliance with the Modern Slavery Act 2015 is mandatory, and Service Providers should maintain transparent supply chains and conduct due diligence to prevent such practices.

Drug-Free Workplace

SGA Technologies and SGA Poole require Service Providers to maintain a workplace free from illegal drugs. Reasonable measures should also be taken to prevent substance misuse that could compromise safety or performance.

Immigration Law Compliance

Service Providers must ensure that all employees have the legal right to work in the country where the work is performed and must verify eligibility through the appropriate documentation as permitted by applicable laws.

Safe and Healthy Work Environment

Service Providers must provide a safe and sanitary workplace, including appropriate protective equipment, and comply with all applicable environmental, health, and safety laws and regulations. Health and safety management systems should align with ISO 45001 or equivalent standards, and proactive measures should be taken to prevent accidents and occupational illnesses.

Environmental & Social Responsibility

Service Providers must operate their businesses in an environmentally responsible manner, complying with all relevant environmental laws and regulations. This includes compliance with the Environmental Protection Act 1990 and the Environment Act 2021, implementing energy efficiency, waste reduction, and carbon management practices. Service Providers should also consider social sustainability, including fair labour, community engagement, and responsible sourcing.

Data Protection & Cybersecurity

Service Providers must comply with the UK Data Protection Act 2018 and UK GDPR when handling personal data on behalf of SGA Technologies or SGA Poole. They must ensure that information systems are secure, that personal and confidential information is processed lawfully and fairly, and that appropriate technical and organisational safeguards are in place to prevent cyber breaches.

Gifts and Gratuities

SGA Technologies and SGA Poole conduct business based on the merits of our products and services. We do not engage in the exchange of business courtesies to gain an unfair competitive advantage, and we expect the same from our Service Providers. Except for modest business meals, refreshments, or promotional items of insignificant value, no Service Provider should offer or provide any gifts, gratuities, or other benefits to our employees. All gifts or hospitality that could be perceived as influencing business decisions must be declared and approved in accordance with our Anti-Bribery Policy.

Conflicts of Interest

Service Providers are expected to avoid any conflicts of interest, or situations that may appear to present a conflict, in their dealings with SGA Technologies and/or SGA Poole. Any potential or apparent conflicts of interest should be reported to SGA immediately. Service Providers must disclose any close personal, financial, or other relationships that could influence business decisions.

Whistleblowing & Reporting Concerns

SGA Technologies and SGA Poole encourage an open culture where concerns about unethical or illegal conduct can be raised without fear of retaliation. Service Providers must provide mechanisms for their employees to report concerns confidentially and in line with the Public Interest Disclosure Act 1998. All suspected breaches of this Code should be reported promptly to the relevant SGA representative.

Exports and Imports

Service Providers must be familiar with and strictly adhere to all applicable laws and regulations regarding exports and imports. This includes compliance with UK export control regulations, sanctions regimes, and customs requirements, and ensuring accurate and transparent documentation.

No Boycotts

Service Providers must not engage in or support any boycotts or blacklisting activities that violate applicable anti-boycott laws or regulations.

Eradication of Conflict Minerals

Service Providers are expected to take steps to determine whether their products contain conflict minerals (e.g., tin, tantalum, gold, tungsten) and, if so, to implement supply chain due diligence to identify the sources of these minerals. Service Providers should also align with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

No Counterfeit Parts

Service Providers must implement appropriate methods and processes to minimize the risk of introducing counterfeit parts or materials into products supplied to SGA Technologies and SGA Poole.

Accounting Practices

Service Providers must comply with accepted accounting standards, controls, and disclosure requirements at all times, ensuring that auditors receive accurate information. No Service Provider should knowingly participate in any scheme that violates these accounting standards. Books and records must be transparent, accurate, and not misleading, in accordance with the UK Companies Act 2006.

Intellectual Property

Service Providers must respect the intellectual property rights of others and comply with all applicable laws and regulations related to patents, copyrights, trademarks, and trade secrets. All technology, software, and data belonging to SGA Technologies or SGA Poole must be used only for legitimate business purposes and protected against unauthorised disclosure or misuse.

Confidential and Proprietary Information

Service Providers are required to protect the confidentiality and proprietary information of SGA Technologies and SGA Poole. Confidential information must not be shared with third parties without written authorisation and must be stored and transmitted securely.

Accurate Technical Information

SGA Technologies and SGA Poole are committed to providing accurate technical information to guide Service Providers and customers in the correct manufacture and use of our products. Service Providers must not knowingly record or use any false technical data.

Antitrust and Fair Competition

Service Providers must conduct their business in compliance with applicable antitrust and competition laws. This includes avoiding discussions with competitors about prices, sales terms, territory or market division, customer allocation, or boycotts. Unfair market practices and abuse of dominant position are prohibited under the UK Competition Act 1998.

Suspected Noncompliance

Service Providers must promptly evaluate and address any suspected noncompliance with applicable laws and regulations. Additionally, they are expected to report any noncompliance issues affecting the company to the relevant SGA Technologies and/or SGA Poole representative. Service Providers must cooperate with any investigation initiated by SGA Technologies or SGA Poole in relation to suspected breaches.

Communication and Training

Service Providers are responsible for communicating the standards outlined in this Code of Conduct to their employees. They must also ensure appropriate training is provided to employees on ethics, compliance, data protection, and anti-bribery topics.

Sub-Tier Suppliers

Service Providers are expected to ensure that any third parties they engage to support their activities on behalf of SGA Technologies and SGA Poole also adhere to similar ethical principles. This includes incorporating equivalent contractual obligations into their supply chain agreements.

Certification

SGA Technologies and SGA Poole may periodically request Service Providers to certify their compliance with this Code of Conduct. Service Providers must provide written certification upon request. Failure to comply may result in corrective actions, suspension, or termination of the business relationship.