



BMT DAS UK

Code of Ethics

May 2018

*BMT DAS UK is referred to as BMT throughout this document

Ethos

BMT (BMT) upholds a high level of business ethics and governance across all areas of our company. Our business practices, in compliance with applicable laws and standards, are governed by -

- Integrity
- Honesty
- Fair dealing

BMT expects our people and our suppliers to follow this code of ethics, as well as our company policies and procedures, whilst working towards achieving our corporate objectives and targets.

Our People

BMT highly values its people, and we are committed to maintaining an exceptional working environment that is culturally diverse and free from all forms of discrimination and harassment. We comply with all applicable civil rights, human rights, and employment laws in our work places.

The company is committed to fostering an open dialogue with our people on important decisions directly affecting them.

Our Relationships

BMT is committed to maintaining strong, honest and engaging customer relationships. We maintain the highest standards of ethics when dealing with our customers and will avoid all corrupt, illegal, dishonest or deceptive business practices. We will also ensure that our customers' information is protected.

We select our suppliers and contractors based on merit, reputation and ability and we achieve our business objectives considering, among other things:

- Price
- Quality
- Reputation for service
- Integrity
- Social responsibility

We require all of our suppliers and contractors to abide by legal and ethical standards and business practices no less stringent than those by which we abide, including compliance with the Modern Slavery Act 2015.

Fair-Dealing

Our company competes successfully in today's business environment and will always do so in accordance with all applicable antitrust, competition and fair dealing laws. We engage only in lawful means of obtaining information about our competitors. All of our people engaged in marketing, sales and procurement have a responsibility to ensure that they are familiar with applicable competition laws. All of our people participate in appropriate ethics and anti-bribery training to equip them with the required

knowledge, skills and aptitude for their role. BMT forbids the practice of bribery and, in accordance with the UK Bribery Act 2010, we will not:

- Offer, promise or give a bribe, including facilitation payments
- Request, agree to receive or accept a bribe
- Bribe a UK or foreign public official

We also require our suppliers to act in an ethical manner, and in accordance with the UK Bribery Act 2010.

Our Interests

At BMT, we promote and protect the company's interests and request our people to avoid conflicts of interest wherever and whenever possible in our commercial activities. We do not use company resources for personal gain. If a conflict of interest occurs, our people are advised to disclose the situation as per company policy. Whilst engaged in BMT work activities, employees solely focus on company business.

Our Information

BMT complies with all applicable data privacy laws, regulations and company policies in the protection and management of all information, including protection of customers' and suppliers' information entrusted to us.

BMT's continued success depends on the appropriate use of its confidential information and its non-disclosure to third parties. Unless required by law, we will not disclose confidential information, or allow such disclosure without a non-disclosure agreement being in place. This obligation continues beyond the termination of employment or other contractual engagement.

BMT maintains only those personal records required for business, legal or contractual purposes and limits access to such data to those who need the information for legitimate business or legal purposes. Due to the nature of our work, BMT has strict access controls in place for accessing certain information, and this is outlined within company policies and procedures.

All of our people have an obligation to abide with these security requirements to protect their own and the company's best interest.

Our Assets

The company safeguards its physical property and financial assets by implementing suitable policies and procedures to prevent their loss, theft or unauthorised use.

At BMT, we never engage in fraudulent activity or any other dishonest conduct involving the property or assets of our company. All expenditures must be undertaken in accordance with company policy, in particular the travel and expenses policy, and must be for legitimate business purposes and never for personal use.

All personnel have an obligation to safeguard and make only proper and efficient use of company property, and must therefore seek to protect the company's property from loss, damage, misuse, theft, fraud, embezzlement and destruction.

Managing non-compliance

At BMT we share a responsibility for ensuring compliance with the requirements of this document and all company policies and procedures, and to seek additional guidance from the appropriate person where necessary. When in doubt, our people will always be guided by the basic principles as outlined in this document, working as a team to deliver on our commitments, and holding each other to account at all levels of the organisation in order to realise our collective ambition.

BMT encourages the reporting of suspected or observed violations of law, company policy or procedures and normal management reporting lines should be sufficient to deal with the great majority of concerns. In some cases it may be appropriate to report the concern outside normal management reporting lines and the company has a whistleblowing procedure in place to deal with these concerns.

Annual Review

All BMT employees and suppliers are required to read this document, understand what is required of them personally, and comply fully with the requirements. The company has established an annual review of the Code of Ethics to ensure continued knowledge and application of its contents.