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## CHALLENGE (EUROPE) LTD

### BUSINESS ETHICS POLICY STATEMENT

#### 1.0 Introduction

Challenge (Europe) Ltd (CEL) is committed to ethical business conduct in the way we interact with our key stakeholders (employees, clients, business partners and suppliers), government and regulators, communities, society and the environment. Our Business Ethics Policy applies to all CEL employees. When CEL operates in conjunction with third parties, where we do not have management control, we will promote the application of these business principles.

#### 2.0 Standard of Conduct

We aim to conduct our operations on sound business principles with trust, honesty and integrity and with respect for the human rights and interests of our employees. We respect the legitimate interests of all those with whom we have relationships.

#### 3.0 Obeying the Law

The Company and all our employees must comply with UK laws and regulations and conduct our operations in accordance with accepted principles of good corporate governance.

#### 4.0 Employees

We are committed to providing a working environment in which employees can realise their full potential and contribute to business success. We respect the dignity of the individual and support the United Nations Universal Declaration of Human Rights and other core conventions. We are committed to diversity in a working environment where there is mutual trust and respect and where everyone is accountable for their actions and feels responsible for the performance and reputation of our company. We aim to recruit, employ and promote employees on the sole basis of their ability to fulfill the requirements of the job. We are committed to developing and enhancing each employee's skills and capabilities. We will provide our employees with safe and healthy working conditions and practices. We monitor and report our health and safety performance.

#### 5.0 Clients

We are committed to providing quality, high value services which meet all applicable safety standards. We value the trust our clients place in us and will safeguard the information provided to us in accordance with relevant laws and contractual commitments.

#### 6.0 Business Partners and Suppliers

We are committed to relations with our suppliers, customers and business partners based on obeying the law. We aim to protect our property (including intellectual property) and respect the property of others. In our business dealings we expect our partners to respect our business principles.

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**Company Registration No. 4715830**  
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#### **7.0 Communications**

We will communicate openly with all stakeholders within the bounds of commercial confidentiality and regulatory constraints. We will ensure that all announcements are accurate, fair, timely and understandable, taking into account applicable standards and regulations.

#### **8.0 Business Integrity**

No employee may offer, give or receive any gift, payment or entertainment which is, or may reasonably be construed as being, a bribe. Any gifts or entertainments offered, given or received must be incapable of appearing to interfere with the impartial discharge of duties. Any employee who is offered an inducement which they feel is intended to interfere with the impartial discharge of their duties must report any such offer to their manager.

#### **9.0 Conflicts of Interests**

All CEL employees must avoid personal activities and financial interests that could conflict, or be perceived to conflict, with their responsibilities to the Company. They must not engage in any business similar to or competing with any business undertaken by the Company. CEL employees must not seek gain for themselves or others through misuse of their positions. Any circumstances that could give rise to a potential conflict of interest must be disclosed in full to the Company.

#### **10.0 Community Involvement**

We acknowledge the interdependency between the success of our business and the well-being of the communities in which we operate. We are committed to making a positive social contribution within those communities and acknowledge our responsibility to engage with the communities in which we work.

#### **11.0 The Environment**

We are committed to making continuous improvements in the management of our environmental impact to promote environmental care and awareness with emphasis on the need to reduce energy consumption and waste production and to monitor and report on environmental management.

#### **12.0 Compliance and Reporting**

Compliance with these business principles is essential to our business success. The Board of CEL is responsible for ensuring these business principles are communicated to, and understood and observed by all employees and associates. Day-to-day responsibility for promoting and implementing these Business Principles is delegated to the senior management of the Company. The Board of CEL requires employees to bring to its attention, or to that of senior management, any non-compliance with our Business Ethics Policy

#### **13.0 Education**

Our Business Ethics Policy forms an integral part of employee training programmes.

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