

OUR CODE
OF BUSINESS ETHICS

Winning Right

spectris



How we conduct our business matters to all of us in Spectris, to our families and to our many stakeholders. We have a proud history of acting with absolute integrity, demonstrating a responsibility to pass to future generations a business that is strong and successful. We work as a team to be a world class sustainable business and we deliver for our customers.

Our Values are there to underpin how we act and behave in everything we do. Our Code of Business Ethics helps us act with absolute integrity and to do business the right way; every day.

Contents

04 Our Values

- 06 Our Values and how we Conduct our Business

08 Our Code

- 12 Our Commitment to the Code
- 14 Our Decision Guide for Making Ethical Decisions
- 16 Asking Questions and Raising Concerns: The Voice of Integrity
- 18 Additional Expectations for our Leaders, Managers and Supervisors

20 Our Responsibilities

How We Conduct Our Business

- 24 Anti-Bribery & Corruption
- 26 Working With Our Business Partners
- 28 Fair Competition
- 30 Trade Compliance & Export Controls
- 32 Environment
- 34 Product Quality & Safety
- 36 Communication

Fair Treatment of Employees

- 40 Health, Safety & Wellbeing
- 42 Working Culture & Employment Practices

- 44 Data Privacy
- 46 Conflicts of Interest
- 48 Human Rights & Modern Slavery

Financial Integrity and Protecting Our Assets

- 52 Intellectual Property
- 54 Use & Safeguarding of Company Assets
- 56 Information Security
- 58 Accuracy & Integrity of Business Records



Our

Values

Our Values and how we conduct our business

Our Values and how we conduct our business matters to our people, our families and the many stakeholders that have an interest in our business. We have a proud history of acting with absolute integrity and a responsibility to pass onto future generations a business that is strong and successful.

We work as a team to be a world class sustainable business that serves our customers and other stakeholders. We do this by taking personal accountability for our Values and behaviours, working together to deliver our promises and constantly aiming to be at our best. Everyday we need to live up to our Values which are the foundation of all that we do in our business:

Our Values help direct our behaviours and they reinforce our success. Put simply, our Values may be summed up as: Be true; Own it; Aim high.

Be true:

We believe in absolute integrity. It's how we win for stakeholders, the environment and each other.

- We do the right things in the right way.
- We speak up when something isn't right.
- We show care and respect for each other.

Own it:

We believe in teamwork and keeping our promises. It's how we build our brands and businesses.

- We are decisive and take responsibility.
- We value diversity and play to everybody's strengths.
- We put customers at the heart of our business.

Aim high:

We believe in being bold and positive. It's how we perform at our best and achieve greater success.

- We continuously strive to improve.
- We keep an open mind and try new things.
- We help each other succeed.

By living up to our Values and our Code we will enhance our productivity everywhere that we operate. Our Values and our Code are about doing business the right way and are a source of our competitive advantage.





Our Code

Our Code

Our Values underpin the way we do business. To set out an ethical framework in which to operate we have a Code of Business Ethics.

Our Code shows how all of us are expected to conduct business everywhere we operate. If local laws are stricter then we must follow them, if local laws are less strict then we must follow our Code.

We take this Code seriously and expect all employees and our business partners to do the same. However, this can only be true if each of us positively engages with our Code. It is NOT a tick the box activity for us, it is a source of competitive strength.

Know it



Live it



Be the voice of integrity

Who does it apply to?

We are all personally responsible for complying with our Code and all associated policies, and supporting materials on the hub; this applies equally across all of our business activities. All leaders, directors, functional heads, managers and supervisors shall actively promote our Code, and make time for regular discussions with their teams on how to apply it to their business.

We expect our suppliers, sub-contractors, temporary workers and other third parties that we work with, to apply the principles of our Code or work to their own similar standards.

We welcome feedback on the content of our Code and will consider your comments carefully. To provide feedback please use spectrishelpline.com.

Our Commitment to the Code

Take time

Everyone is required to review this Code, all associated policies, and the supporting website, and become familiar with them. It is your responsibility to know what our Code covers, to commit to the spirit of our Code and to recognise it as a vital guide when:

- you are facing an ethical dilemma;
- you have a question or concern; or
- you are concerned about behaviours that may conflict with our Code, policies or Values.

Give support

We can all face challenges at work from time to time. If you observe a colleague who might be struggling, for whatever reason, use our Values and our Code to give guidance and support. If they are facing a compliance challenge look to the detail provided on the Code website to help find the right way forward.

Understand consequences

Our Code is of no use if we do not stand up for it, therefore breaches of our Code will be treated seriously and could include disciplinary action including termination of employment.

Our Code does not have the answer for every situation, but it can support you with any concern or difficult conversation you need to raise with your manager or a local leader. It is the responsibility of leadership to support this Code; it is your responsibility to use it. Our Decision Guide on page 14 is here to help you in these situations.

Our Decision Guide for Making Ethical Decisions

In most situations, it is not difficult to make the right decision, but at times we all face decisions where the 'right' answer is not clear or where we know the right answer, but finding the courage to act is difficult.



It is for these situations that we have created our Decision Guide. The Decision Guide contains a simple set of questions to support our ethical decision-making. It is most effective when used to guide a discussion with a colleague or colleagues. It is when we become isolated in our decision making that poor choices become more likely.



Asking Questions and Raising Concerns: The Voice of Integrity

Each of us has a duty to live up to our Values and our Code; this is not a passive activity. We all have an active responsibility to speak up and be the Voice of Integrity. This means that when we have ethical concerns we all have a duty to speak up. This is not always easy, but it is the right thing to do. You are not required to be 100% certain that something has occurred, though you should always be acting with positive intent. Any concern raised in good faith will be respected and your confidentiality will be respected.



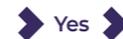
Always remember

- There is a zero tolerance policy regarding retaliation. If you raise a concern in good faith you will be protected.
- Anyone who retaliates against an individual raising a concern will face disciplinary action.
- You can also use the Helpline to ask a question if you are unsure. It doesn't need to be an allegation or concern.

Raising a concern or question



Can you speak to your line manager about your question or concern?

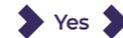


Contact your line manager



No

Can you speak to another manager in your team?



Speak to other management in your team



No

Can you contact a relevant Specialist function?



Contact Specialist functions (e.g. E&C, HR, Legal)



No

If none of these Speak Up options work for you contact the Helpline



Contact the Spectris Helpline

Further information:

You can contact the Helpline at www.spectrishelpline.com or by phone.

Local phone numbers are available on this website.

Do I have to reveal my name on the Helpline?

It helps us investigate an issue if you provide details of your name when you make a report. However, if you wish to remain anonymous then, subject to local laws, the Ethics & Compliance team can still communicate with you using the website while maintaining your anonymity.

All Helpline cases are assessed by the Ethics & Compliance central team and an appropriate response and follow-up determined.

Additional Expectations for Our Leaders, Managers and Supervisors

We all have an active responsibility to live up to the spirit and letter of our Values and our Code, but our leaders, managers and supervisors have additional responsibilities to foster a working culture that truly enables success whilst ensuring that business is done in the right way.

All of our leaders, managers and supervisors are expected to:

- **Set an active example** for living our Values through their actions and not just words.
- Ensure that our **business targets are never used to justify avoiding our Code commitments.**
- **Make time** to regularly talk about our Code with our teams, including its opportunities and challenges.
- Encourage a constructive **speak up** culture and recognise that when someone is raising a concern they are trying to help our business improve.
- **Be vigilant for any signs of retaliation** against colleagues who have spoken up with genuine concerns or questions.
- **Listen** to colleagues and encourage the quietest voice in the room to contribute.

As well as setting an active example for their teams, our leaders, managers and supervisors must themselves always feel comfortable to speak up with any question or concern touching our Values or Code. No-one in our business should feel isolated, irrespective of how experienced or senior they are. **Our Code and Helpline are here to support and enable everyone of us.**



Our Responsibilities

How we Conduct
Our Business

Fair Treatment
of Employees

Financial Integrity and
Protecting Our Assets



How we Conduct Our Business

- 24 Anti-Bribery & Corruption
- 26 Working With Our Business Partners
- 28 Fair Competition
- 30 Trade Compliance & Export Controls
- 32 Environment
- 34 Product Quality & Safety
- 36 Communication

Anti-Bribery & Corruption

Why? Bribery & corruption damages communities, individuals and our commercial interests. It is also illegal.

Our commitments:

We have a **zero tolerance policy for any form of bribery or corruption in our business dealings.**

We expect **exactly the same behaviours from any business partner** working on our behalf and we will undertake the appropriate due diligence and monitoring to support this position.

We **never offer, request or accept any gifts, hospitality or entertainment that could be perceived as a bribe**, this includes inappropriate charitable donations and sponsorships. Our business will maintain a register for recording gifts, hospitality and entertainment which must always be used.

We do not make facilitation payments nor permit others to make them on our behalf. **We recognise even small facilitation payments as a form of bribery.**

Your role and responsibilities

- Never offer, request or accept anything of value to gain or give an improper business advantage or improperly influence a business decision – this is bribery.
- Be sensitive to bribery and corruption risks when offering or accepting gifts, hospitality or entertainment and always comply with our policies.
- Be upfront and clear with all business partners working on our behalf about our anti-bribery and corruption commitments.
- Never become isolated if facing any form of bribery or corruption risk – if in doubt stop and seek guidance.
- If facing a demand for money, or other things of value, where your physical health, safety, or wellbeing is at risk, pay, get yourself to safety and immediately report to your manager or the Legal team.
- Local customs are never an excuse for bribery, they are still unacceptable and illegal.
- Never use corporate assets or funds for political donations.



Always remember

- We have zero tolerance for bribery or corruption in our business dealings.
- We expect the same standards from our business partners.
- Be vigilant about bribery and corruption risk when offering or accepting any gifts, hospitality or entertainment.
- Follow group and local policy for completing your gifts, hospitality and entertainment register.
- Using local customs as a defence for bribery or corruption is never acceptable.
- Perception matters, if any action risks being perceived as involving bribery or corruption, stop and seek immediate guidance on how this can be managed.

Where to go for help:

- Speak to your Ethics & Compliance Officer, Legal Counsel, Line Manager or HR Manager.
- Search the terms “Anti Bribery and Corruption” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.

Working With Our Business Partners

Why? The behaviour of our business partners (both good and bad) can significantly impact our business.

Our commitments:

We will only engage with **business partners** (including suppliers, vendors, agents, intermediaries, distributors, customers and others we do business with) of known integrity, who have passed through our appropriate **due diligence controls**.

In order to work with us **our business partners must respect and act consistently with our Values and our Code**.

We will **treat all of our business partners fairly** and as we would wish to be treated.

We take care of commercially sensitive information which our customers or business partners provide to us. We use it appropriately only for legitimate business purposes and only share it with those colleagues who need to know it to support our business.

Your role and responsibilities

- Communicate clearly and honestly with our customers, suppliers and partners, but take care to protect our intellectual property and only use intellectual property of others with their permission.
- Do not disclose confidential information either to colleagues, or outside our business, unless authorised to do so.
- Make sure that all communications in bid preparations and contract negotiations with customers are accurate and truthful.
- Be rigorous in completing due diligence steps when appointing any new business partner.
- Speak up if you observe or fear wrongdoing by one of our business partners and take action if their behaviours are contrary to our Code.
- Treat all our business partners with respect and help them to be an ambassador of our Values.
- Help to ensure our business partners understand our expectations of them and where appropriate communicate that we will monitor what they deliver and how they deliver it.

Where to go for help:

- Speak to your Sales Director, Supply Chain Manager, Legal Counsel or Ethics & Compliance Officer.
- Search the terms “Third Parties, Channel Partners, Distributors, Suppliers” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- Treat our business partners as we wish to be treated.
- We are responsible for the actions of our business partners when they are acting on our behalf.
- Respect and always follow our due diligence procedures – they exist to protect you and our business.

Fair Competition

Why? We win by winning right, by having the best products and solutions, and we thrive in markets that are fair and open.

Our commitments:

We believe in open and fair competition and comply with all competition and anti trust laws.

We act with independence in all our commercial decisions and when setting prices.

We will **never seek to collaborate or co-ordinate with our competitors, suppliers or distributors** in a way that could seek to unfairly limit competition – this means we will never participate in illegal price co-ordination, bid rigging, abuse of dominance, market abuse or customer/market allocation.

We develop our commercial strategies and pricing plans using market intelligence from **legitimate sources and our own independent analysis.**

Your role and responsibilities

- Do not make formal or informal arrangements with competitors which results in price fixing, bid rigging, market allocation and arrangements to limit supply.
- Do not share commercially sensitive information with competitors, which may include information relating to prices, ongoing bids, terms and conditions of sale, costs or project margins.
- Never get drawn into discussing forward looking commercial strategies, pricing or markets with a competitor in any setting (for example meetings, industry events, trade associations, social events).
- Seek advice from the Legal team before agreeing exclusive arrangements, entering collaboration agreements with competitors, selective pricing agreements, bundling products, or refusing to supply.
- If you become aware of or are concerned about any potentially anti-competitive behaviour **immediately speak with the Legal team.** Leave any meeting when anti-competitive discussions take place and inform the Legal team.
- Treat all other parties confidential, proprietary, or trade secret information with integrity and in compliance with the relevant laws and regulations.

Where to go for help:

- Speak to your Legal Counsel, Ethics & Compliance Officer or Sales Director
- Search the terms “Fair Competition” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- Co-ordinating price fixing, bid rigging, customer or market allocation with our competitors is criminal behavior.
- Anti-competitive arrangements are not always written, they can be entered orally, by signaling or by staying silent when others agree a course of action.
- Speed is important when raising a specific concern with our Legal team.

Trade Compliance & Export Controls

Why? Our products, services and business information are exported globally, doing this legally is critical for our business.

Our commitments:

We will comply with all applicable **export control, sanctions, customs laws and regulations.**

We will ensure that **controls, policies and procedures** are in place to support the lawful export of our goods, services, information and technologies.

Your role and responsibilities

- Comply with applicable export and import laws and regulations when transporting goods, services, software or technology within your country or across national borders.
- Comply with national and international sanctions and embargoes and the company's destination specific policies when doing business with entities in other countries.
- Rigorously follow our Trade Compliance policies and **if in doubt seek guidance before acting.**
- **Know what you are exporting, where it is going, the end use and who the final user is.**
- Ensure you are familiar and comply with any restrictions that may apply to the goods, information and services that you are supplying or acquiring, and know to who and where you are supplying them.
- Be aware of **any restrictions that may apply to you as an individual.**
- **Prepare in advance** and ensure we accurately complete the appropriate documentation and maintain records.
- Make sure that all duties, levies and tax obligations are satisfied, the terms and conditions of import or export authorisations are complied with, and all necessary import and export declarations are made to the relevant authorities at the port of exit and/or entry.
- Be clear that our Trade Compliance responsibilities extend to agents and other third parties who may be acting on our behalf.

Where to go for help:

- Speak to your Ethics & Compliance Officer, Export Control Officer or Legal Counsel.
- Search the term "Trade Compliance" on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- This can be a complex and changing area, always seek advice from your local Export Control Officer if you are unsure how to proceed.
- The consequences for breaking export controls or supplying to a sanctioned country or individual are severe and can apply both to our business and individual employees.
- Export controls can apply to information as well as goods, services and technology.



Environment

Why? Working in an environmentally sustainable way is good for all of us and is becoming a requirement of many of our customers and from the communities where we work.

Our commitments:

We will comply with all environmental laws and regulations that apply to our business.

We are striving to minimise the impact of what we do upon **the environment** in which we operate .

We are focused on **growing sustainably** while striving to take care of the environment across our business. We will encourage our business partners to do the same.

Your role and responsibilities

- Understand and follow all environmental policies that apply to you.
- If you become aware of any contravention of our policies stop and report immediately.
- Be a clear voice for promoting environmental sustainability in all that we do.

Where to go for help:

- Speak to your HSE Manager, Legal Counsel, Ethics & Compliance Officer, Line Manager or HR Manager.
- Search the terms “Environmental and Sustainability” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- Working in a sustainable manner makes sense not just environmentally but commercially.
- We all have a role to play in ensuring the environmental sustainability of our operations.



Product Quality & Safety

Why? Our customers demand high quality and safe products and services.

Our commitments:

We will strive to ensure that throughout their life cycle our products and services meet the quality standards we have set.

We will always operate in a manner **that safeguards the quality and safety** of our products and services.

We have a **duty to our customers** to provide them with products and services that match the promises we have made.

Your role and responsibilities

- Comply with both the letter and spirit of all relevant product quality and safety laws and regulations.
- Report any quality or safety concerns as soon as you become aware.
- Follow product quality and testing plans carefully and without compromise.
- Work together to continuously improve our products, services, processes and procedures.

Where to go for help:

- Speak to your Quality, Product or Service Manager, Legal Counsel, Ethics & Compliance Officer, Line Manager or HR Manager.
- Search the terms “Quality, Product Quality or Service Quality” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- Product quality and safety is something we are all responsible for.
- Safety, assurance and testing procedures must always be adhered to.
- If in doubt speak to somebody.

Communication

Why? Our reputation matters, we all have a role in what and how we communicate and to behave in a manner that reflects well on our brand.

Our commitments:

We will strive to ensure that **public communications are accurate, clear and responsible.**

We will work with the media to assist them in understanding our business.

We will be **honest and truthful** in all our sales, marketing and advertising activities.

Spectris Group will keep all our shareholders well informed by providing information they can access easily.

Your role and responsibilities

- Do not speak to members of the media or the investment community about our business without prior authorisation.
- Use care and good judgment when speaking about our business, employees and business partners, even when not in the workplace.
- Never quote or reference business partners without their prior consent.
- Never use social media to post or display information about the company and its stakeholders that is vulgar, obscene, threatening, intimidating, harassing, libelous, discriminatory or inaccurate.
- Ensure that your personal social media activities and comments could never be interpreted as representing our business.
- Direct any media enquiries to your local external communications manager.

Where to go for help:

- Speak to your Marketing Communications Manager, Legal Counsel, Ethics & Compliance Officer, or HR Manager.
- Search the term “Communication” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always
remember

- Our communication principles covers all aspects of sharing information from social media through to talking to the press.
- Referring to work on social media channels is not a private communication.



Fair Treatment of Employees

- 40 Health, Safety & Wellbeing
- 42 Working Culture & Employment Practices
- 44 Data Privacy
- 46 Conflicts of Interest
- 48 Human Rights & Modern Slavery

Health, Safety & Wellbeing

Why? Everybody has the right to a healthy and safe working environment.

Our commitments:

Health, safety and wellbeing of our people is our first priority. We will constantly strive toward zero harm from our business actions.

We set and expect high standards for protecting the health, safety and wellbeing of ourselves and others. We demand the same from all we interact with.

Your role and responsibilities

- Follow all Health, Safety and Wellbeing policies covering your role and location(s) and make sure you have completed the competence training required for your role.
- Take personal accountability to help protect and enhance health, safety and wellbeing.
- Ensure that we never put ourselves or others at risk from our actions or inactions.
- Stop work and intervene if you believe there is an unsafe situation.
- Report without delay if you see or suspect unsafe working practices.
- Actively support learning from health and safety incidents, near misses, and unsafe acts or conditions.

Where to go for help:

- Speak to your HSE Manager, Legal Counsel, Ethics & Compliance Officer, Line Manager or HR Manager.
- Search the terms “Health & Safety and Wellbeing” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- Health, safety and wellbeing is our individual and collective responsibility.
- This applies to our physical health, mental health and wellbeing.

Working Culture & Employment Practices

Why? Our working culture is our most important growth driver.

Our commitments:

We continually aim to create a **respectful working culture** that is genuinely open and inclusive and free from any kind of bullying, harassment or discrimination; this is fundamental to our commercial success.

We will continually assess our operations to promote a **diversity of background, experience and thought** within our teams; this is critical to our growth. We will only hire, retain and promote colleagues on the basis of merit and will not tolerate any form of discrimination in our decision-making.

We strive to provide **fair opportunity and reward for all colleagues** in line with our policies and living our Values.

Your role and responsibilities

- All job role decisions will be made based on merit, ability and demonstration of our Values.
- If you observe bullying, discrimination, or inappropriate behaviours you must speak up even if this is difficult.
- Listen carefully to all genuine concerns and never tolerate any form of retaliation.
- Respect differences and accept responsibility for contributing to a workplace that is genuinely inclusive.
- Whatever your role or position, take the opportunity to lead by example.

Where to go for help:

- Speak to your HR Manager, Legal Counsel, Ethics & Compliance Officer or Line Manager.
- Search the terms “Working Culture and Employment Practices” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- We treat each other with fairness and respect.
- Bullying, harassment and discrimination have no place in our working culture.
- We speak up about concerns.
- We are all setting an example everyday.

Data Privacy

Why? It is our responsibility to treat any personal data in our possession with a duty of care.

Our commitments:

We comply with applicable privacy laws and **our Binding Corporate Rules**.

We only process personal data for legitimate business purposes.

We are **transparent and accountable** in how we gather and use data.

We **keep personal data confidential and secure** and report and notify incidents.

We safeguard personal data before disclosing it to third parties and transferring it abroad.

We **respect the privacy rights** of individuals.

Your role and responsibilities

- Familiarise yourself with our Global Data Protection Policy (including our Binding Corporate Rules) and act in accordance with it and our privacy commitments.
- Do not process personal data in breach of the terms of our Global Data Protection Policy.
- Report as soon as possible if you know of, or suspect, a breach of the Global Data Protection Policy.
- Seek help from your Business Privacy Lead if you are in doubt or have any questions in relation to personal data.

Where to go for help:

- Speak to your Data Protection Manager, HR Manager, Legal Counsel or Ethics & Compliance Officer.
- Search the terms “Data Protection” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual – if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



- If you are processing personal data, you are responsible for looking after that personal data.
- Personal data should not be kept longer than needed for the purpose for which it was collected.

Conflicts of Interest

Why? We must not let any personal interests impact the quality of our decision-making for our business.

Our commitments:

- We avoid conflicts of interest in our business dealings, but where they occur, we deal with them.
- Regardless of anyone's role or position, all conflicts, or potential conflicts, shall be disclosed and reviewed in advance of any decisions that could impact our business interests.
- We will seek to manage conflicts of interest through disclosure and removal from connected decision-making, where appropriate.

Your role and responsibilities

- **Make all your business decisions in the best interests of our business.**
- **Avoid any relationship, influence or activity that may impair your ability to make objective decisions when performing your role.**
- **Declare and discuss any conflicts of interest, or potential conflicts, to your manager and record as per local and Group policies.**
- **Be aware that conflicts can come in many different forms, for example:**
 - Financial or family interests in competitors, customers, suppliers or other business partners
 - Using the company's assets for personal gain
 - Exploiting opportunities discovered during your work for personal gain rather than in the best interests of our business
 - Hiring, managing or supervising a relative or relationship partner
- Awarding business to yourself, a relative, relationship partner or close associate
- Dealing in Spectris shares using non-public or inside information.
- **Without prior approval, never provide any services in a personal capacity to any actual or potential competitor, supplier, customer or other business partner.**
- **Never use any non-public information about our business or other companies we are dealing with for buying or selling shares, other securities or financial instruments for personal gain, or pass on such information to someone else.**
- **Remember that even the appearance of a conflict of interest can cause others to judge us negatively. If you ever have a doubt, seek guidance.**

Where to go for help:

- **Speak to your Ethics & Compliance Officer, Legal Counsel, Line Manager or HR Manager.**
- **Search the terms "Conflict of Interest" on the Spectris or your local operating company website or hub.**
- **Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.**



Always remember

- A conflict of interest is not necessarily a violation of our policy. Failure to disclose it, always is.
- Transparency and openness in our decision-making helps to avoid the perception of a conflict of interest.
- If in doubt, then disclose to your manager.

Human Rights & Modern Slavery

Why? It is the right thing to do. A sustainable business must protect human rights and prevent modern slavery.

Our commitments:

We strive to conduct our business in a way that **respects the human rights and dignity of people.**

We adhere to all laws relating to human rights and modern slavery.

We are committed to preventing modern slavery, child labour and human trafficking across all our corporate activities and working to ensure that **our supply chains are free from these practices.**

Your role and responsibilities

- Be vigilant to ensure that all employees and anyone who works with us does so free from slavery and is safe from abuse.
- Support all necessary human rights due diligence for any business partner you are looking to engage.
- If you suspect that anyone's human rights are being abused in connection with our business you must speak up.

Where to go for help:

- Speak to your HR or Supply Chain Manager, Legal Counsel or Ethics & Compliance Officer.
- Search the terms "Human Rights and Modern Slavery" on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- We have a responsibility, both legally and morally, to ensure that people working for us directly or indirectly do so freely and safely.
- Modern slavery is real and we must play our part in actively working to ensure that it does not touch any elements of our supply chain.



Financial Integrity & Protecting Our Assets

- 52 Intellectual Property
- 54 Use & Safeguarding of Company Assets
- 56 Information Security
- 58 Accuracy & Integrity of Business Records

Intellectual Property

Why? It is essential that we protect our innovations and intellectual assets and recognise and respect those of others.

Our commitments:

We must **respect and protect the intellectual property and innovations we hold and create** across our business.

We **safeguard all our valuable information** and remain aware of external threats that may seek to exploit or steal this from us.

We will **respect the intellectual property and valuable information of others** and only use it and store it with the correct authorisation.

Your role and responsibilities

- Ensure your intellectual property lead (IP Tsar) is aware of any new innovations or brands we develop so these can be appropriately protected.
- Treat our intellectual property and valuable information as the vital assets that they are.
- If you have any doubts check with Legal before sharing or collaborating on aspects of our intellectual property with external parties.
- Contribute to developing new innovations and enhancements that can strengthen our commercial position.
- If you are in receipt of 3rd party intellectual property, protect and respect it.

Where to go for help:

- Speak to your Legal Counsel or IP Tsar.
- Search the terms "Intellectual Property" on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- Care for our intellectual assets just as you would our financial or other assets.
- Follow our policies and controls to appropriately identify and protect our innovations and confidential information.
- Respect the IP of others and only use with their consent.



Use & Safeguarding of Company Assets

Why? Our assets enable us to operate safely and efficiently and grow our business.

Our commitments:

Our technologies, intellectual property, commercially sensitive information, financial and physical assets are vital to our business and we protect them from unauthorised use and disclosure.

We will work to obtain the best value from our assets by **using them properly and protecting them** from mis-use.

Your role and responsibilities

- Act appropriately to protect company assets and only use them for our business purposes.
- Never use company assets for personal use or gain without the appropriate authorisation.
- Maintain company assets with care, avoid waste and protect them from theft or damage.
- Only use company assets for the business purpose for which they were designed.
- Only use company assets, including IT equipment, for carrying out company business and do not try to circumvent IT acceptable use and security controls.
- Promptly report the misuse of any company assets.
- Disposal of any assets should be done in accordance with local procedures and policies.

Where to go for help:

- Speak to your Line Manager, Legal Counsel, Ethics & Compliance Officer or HR Manager.
- Search the terms “Safeguarding Company assets” on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



- Company assets include raw materials, finished goods, tools, facilities, property, equipment, IT resources, intellectual property and funds.
- Mis-use of assets can damage the business in multiple ways.



Information Security

Why? Information is at the heart of our business and we must protect it.

Our commitments:

We are committed to **handling business and personal information responsibly** and in compliance with all applicable laws and customer requirements.

We strive to protect all **information, systems, applications, networks and devices** across our businesses from external threats looking to exploit any weaknesses in our physical or digital security.

We do not tolerate the use of our business information systems and assets to access, store, or transmit anything considered to be offensive, obscene or inappropriate.

We have a duty to **protect and make proper use of information** belonging to others.

Your role and responsibilities

- To prevent any inappropriate use of information.
- Rigorously protect the information in your care.
- Be vigilant toward phishing emails, false websites and unsolicited calls asking for personal or business details.
- Never use our business information systems and assets to access, store or transmit any information considered to be offensive, obscene or inappropriate.
- To ensure that you follow our procedures when providing information to a third party.
- To contact your local Security lead if you have any concerns regarding the integrity or vulnerability of our business information.

Where to go for help:

- Speak to your Security Lead, IT Manager, Legal Counsel, Ethics & Compliance Officer or HR Manager.
- Search the terms “Information Security” or “Cyber Security” on the Spectris hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- If you lose or suspect you have lost business, personal, or other information this must be reported immediately.
- Respect and follow our personal information controls and procedures.
- Threats to our information are real, always raise a concern if you become suspicious.

Accuracy & Integrity of Business Records

Why? Trust in our business is dependent on the certainty of our financial conduct, published information and the controls that help maintain this.

Our commitments:

We maintain accurate and complete records of all our business dealings.

We will follow all applicable regulations relating to **tax, duties and anti-money laundering**.

We will **maintain on a timely basis accurate and complete records** of our financial transactions, in accordance with our policies, internal control framework and applicable professional standards.

Your role and responsibilities:

- To accurately record all financial and other matters.
- Ensure that any irregularities are immediately notified.
- Preserve documents and records in accordance with applicable legal requirements.
- Follow all customer due diligence controls touching your activities.
- Complete product inspection and testing documentation truthfully and accurately.
- Record all hours worked accurately in accordance with local procedures.
- Demonstrate integrity in submitting all personal expenditure in accordance with company policy.
- Never make a false or deliberately misleading entry in a report, record, expense claim or falsify any corporate record.

Where to go for help:

- Speak to your Finance Manager or Legal Counsel.
- Search the terms "Finance" on the Spectris or your local operating company website or hub.
- Check the Spectris Group Manual - if you do not have access to it ask your HR, Legal or Ethics & Compliance contacts.



Always remember

- All our stakeholders depend on us to accurately record and share financial and other information.
- Failures in this area could lead to serious legal, financial and reputational impact.

spectris

OUR CODE
OF BUSINESS ETHICS