



## TECHNO GROUP

MANUFACTURERS OF HIGH PRECISION  
MACHINED COMPONENTS

### **Business Ethics & Policies**

### **Techno Group including Subsidiary's Technoset and Technoturn.**

Integrity is one of Techno Group's Core Values and we apply the highest ethical standards to all we do. This Policy Statement defines the Company's goals in this area and the principles of business conduct that will help us achieve our objectives.

#### **Our Goals**

- To act fairly, honestly and with integrity at all times in everything that we do and to comply with all applicable laws
- To treat our employees, contractors and suppliers and other stakeholders fairly and with respect.
- To create a high quality, equal opportunities working environment for all of our employees, based on merit and free from discrimination, bullying and harassment.
- To respect Human Rights
- To earn the trust of our stakeholders by acting consistently and reliably in accordance with this Ethics Policy Statement.

#### **Policy Review**

This policy has been established by top management and will be reviewed annually at our Management Review

#### **Code of Conduct**

Our code of conduct is designed to help the companies achieve the above goals by providing guidance on how to make decisions consistent with this policy and our values and what you should do if you are confronted with unethical behaviour. Every Techno Group employee shall endeavour to uphold the code of conduct by:

- Complying with the laws in all jurisdictions in which Techno Group operate
- Not offering, requesting or accepting any bribe or other corrupt or improper payment or benefit
- Avoiding any situation in which personal financial, political or other interests may conflict with the proprietary information
- Using best endeavour to prevent the inappropriate use or disclosure of any confidential or proprietary information.
- Reporting to line management any behaviour that is believed may not be in accordance with the code of conduct or this ethics statement policy.
- Acting as a custodian of our shareholders assets and interests.



## **Techno Group Anti Bribery Policy**

### **Introduction**

Techno Group Ltd and its' subsidiaries, Technoset Ltd and Technoturn Ltd, have a zero-tolerance policy towards bribery and corruption and are committed to acting fairly and with integrity in all business dealings and relationships.

### **Policy**

The aim of this policy is to ensure Techno Group Ltd and its' subsidiaries act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of our zero-tolerance to bribery.

This policy applies to all permanent and fixed-term staff employed by Techno Group Ltd and its' subsidiaries and to any contractors, consultants or other persons acting under or on behalf of the Techno Group Ltd and its' subsidiaries.

### **Techno Group Ltd and its' subsidiaries will not:**

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, kickbacks of any kind.

### **Company Responsibility**

- To keep appropriate internal records that will evidence the business reason for making all payments to third parties.
- To encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- To ensure that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.



## **Employee Responsibility:**

- To act honestly, responsibly and with integrity
- To safeguard and uphold our core values by behaving in an ethical, professional and lawful manner at all times.
- Employees must not, in relation to their employment, accept, request or offer a financial or other reward in return for providing some favor to another person or company.

## **Business Gifts**

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited; provided the following requirements are met:

- the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- it complies with local laws
- it is given in the Techno Group Ltd and its' subsidiaries name, not in the giver's personal name
- it does not include cash or a cash equivalent (such as gift vouchers)
- it is of an appropriate and reasonable type and value and given at an appropriate time
- it is given openly, not secretly
- it is approved in advance by a Director of the Company.

The receiving of business gifts by employees from suppliers, contractors or customers is not prohibited; provided the following requirements are met:

- the gift is not accepted with the intention of rewarding the donor with any business advantage in any way
- it complies with local laws
- it is received openly, not secretly
- it does not include cash or a cash equivalent (such as gift vouchers)
- it is of an appropriate and reasonable type and value and given at an appropriate time
- it is advised to a director upon receipt.



## **Sanctions for Breach**

A breach of any of the provisions of this Policy by an employee will constitute a disciplinary offence and will be dealt with in accordance with our disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

A breach of this Policy by any contractor, agency or supplier could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

## **Monitoring Compliance**

The directors will monitor compliance with this Policy and will review its contents on a regular basis to ensure the Policy continues to comply with our legal and ethical obligations.

## **Modern Slavery Policy**

In accordance with the Modern Slavery Act 2015, Techno Group and its subsidiaries namely Technoset Ltd and Technoturn Limited are committed to a work environment that is free from human trafficking, forced labour and unlawful child labour. (Collectively “human trafficking and slavery”). We strongly believe that we have a responsibility for promoting ethical and lawful employment practices.

Accordingly, Techno Group will not knowingly use unlawful child labour or forced labour on any of the products or services it provides, nor will we accept or tolerate products and or services from external providers that employ or utilize child labour or forced labour.

## **Conflict Materials Policy**

Re: Conflict Material or Dodd-Frank Wall Street Reform and Consumer Protection Act.

Conflict Material are described as Gold (Au), Tantalum (Ta), Tungsten (W) and Tin (Sn) that is sourced from the Democratic Republic of Congo or adjoining countries from mines controlled by non-governmental military groups.

Techno Group undertakes due diligence with our reputable service providers to ensure that no Techno Group parts contain mineral or materials that in any way contribute to conflict or human rights abuses.



## Counterfeit Parts Policy

Our policy is to purchase new and authentic materials or parts from authorised suppliers.

Independent distributors are only used after a reasonable search for material from franchised/authorised sources have been exhausted and after consideration of an alternate part from an authorised source. The use of independent distributors requires the approval of the customer or the approval of a Managing Director of a Techno Group company.

Supply chain and quality management perform periodic evaluation of suppliers to assure that approved/ongoing sources of supply are maintaining effective processes for mitigating the risks of supplying counterfeit parts and to evaluate overall performance.

Purchased product is verified before use to assure detection of counterfeit parts prior to formal acceptance. Goods Receiving Inspection checks the purchase order against purchasing documents to verify the identification, quantity, and condition of the items in the order. Verification may include: obtaining objective evidence of the quality of the product from suppliers through documentation, certificate of conformity, test reports etc., review of required documentation, and visual inspection of products upon receipt, XRF verification, X-ray inspection, non-destructive evaluation, and destructive testing.

Any Material/Parts identified as suspect or counterfeit will be immediately tagged or marked, segregated and quarantined.

The supplier will be contacted and provided with the data that supports the counterfeit nature of the material. If the vendor contests the determination that the parts are counterfeit then they may request that the parts are sent to an agreed, independent third-party test house.

If the parts are confirmed to be counterfeit the material must be made unusable and documentary evidence provided to the supplier. Specifically, the parts should be physically destroyed (e.g., grinding, breaking, or crushing) prior to disposal.

Counterfeit parts are reported to the applicable Government authorities, Government reporting organisations.



## **Company Product Safety Policy**

Techno Group are manufacturers of ultra-precision machined components and assemblies to industries including Aerospace and these include the manufacture of critical products that people's lives could depend upon.

The principles that govern our approach to Product Safety are;

### **Leadership, Commitment and Accountability.**

Our leaders champion product safety and prioritise it so that safety-related tasks get the right attention, time and resources. We make accountability for product safety clear and ensure people understand what they are accountable for.

### **Level of Product Safety.**

We manufacture products to achieve a high level of safety consistent with their application, always ensuring that we meet or better the relevant company, legal, regulatory and industry requirements. We assess what could go wrong and put controls in place to meet the required safety levels and reduce the safety risks so far as is reasonably practicable.

### **Maintaining and Improving Product Safety.**

We are committed to the continuous improvement of product safety and actively engage in setting industry standards and good practice. We measure our performance and rigorously investigate and resolve safety related issues, systematically embedding the learning from these back into our practices and processes. Everyone is encouraged to report any product safety concerns.

### **Conforming Product.**

Robust quality is an essential building block of product safety and by following our processes we ensure that our products and those of our suppliers conform to their specification.

### **Safety Awareness and Competence.**

Everyone who works in Technoset shares responsibility for product safety and we have to be mindful of the safety implications of our actions. Training is provided so that our people understand the Product Safety Policy and processes and can fulfil their collective and personal responsibility.