

discoverIE Group plc

Business Ethics Policy – May 2023

1.1 Background

discoverIE is committed to the best corporate practices and ethical values. We aim to conduct our operations on sound business principles with trust, honesty and integrity, ensuring that our products are provided to the agreed standards and are safe and of high quality, 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. This Policy is intended to set out a summary of our business ethics and should be read in conjunction with our other Policies (available at www.discoverieplc.com).

discoverIE's Board of Directors has adopted this Policy and has delegated day-to-day responsibility for implementation of the Policy to the management of discoverIE's operating companies.

1.2 Scope

This Policy applies to:

- 1.2.1 all legal entities worldwide owned directly or indirectly by discoverIE, including subsidiaries, branches and affiliates; and
- 1.2.2 all Group employees worldwide.

All suppliers and contractors are expected to operate their businesses in a way that supports discoverIE's commitments set out in this Policy.

1.3 Obeying the Law

Group businesses and all employees must comply with relevant laws and regulations and conduct operations in accordance with accepted principles of good corporate governance.

1.4 Employees

We provide our employees with safe and healthy working conditions and practices and require the same of suppliers. We monitor and report our health and safety performance.

The Group is committed to providing a working environment in which employees can realise their full potential and make a valuable contribution to the businesses in which they work.

We respect the dignity of the individual and are committed to fostering a diverse and inclusive culture where there is mutual trust and respect and where everyone is accountable for their actions and feels responsible for the performance and reputation of their business.

We pay our employees fairly and offer competitive salaries and benefits packages, and recruit, employ and promote employees on the sole basis of their ability to fulfil the requirements of the job. We are committed to developing and enhancing each employee's skills and capabilities.

1.5 Business Partners and Suppliers

We are committed to relations with our suppliers, customers and business partners based on obeying the law and dealing ethically. 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 as outlined in this Policy.

1.6 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.

1.7 Business Integrity & Fraud

discoverIE is committed to our responsibilities under the UK Bribery Act 2010 and the UK Criminal Finances Act 2017 (Prevention of Facilitation of Tax Evasion). The Group operates a zero-tolerance policy towards corruption, bribery and non-compliance with legal and financial obligations.

The Group is committed to making pro-active fraud management an integral part of how we do business. As part of this, we are committed to principles relating to preventing, reporting and managing fraud and corruption risk, including maintaining effective measures and procedures to deter fraud. The Group has implemented a Fraud Red Flags Protocol, which is available to internal and external stakeholders.

Further details can be found in our Anti-Bribery Policy, Whistleblowing Policy and Fraud Red Flags Protocol, which are all available on our website at www.discoverieplc.com.

1.8 Conflicts of Interest

All Group employees must avoid personal activities and financial interests that could conflict, or be perceived to conflict, with their responsibilities to the Group. They must not engage in any business similar to or competing with any business undertaken by any Group company. Employees must not seek gain for themselves or others through misuse of their positions.

1.9 Community Involvement

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

1.10 The Environment

We are committed to making continuous improvements in the management of our environmental impact and have a range of Policies and targets in place to address this. Please see www.discoverieplc.com for further details.

1.11 Related Policies

This Policy should be read alongside our other Policies (available at www.discoverieplc.com). Those Policies include the following:

- Sustainability Policy
- Anti-Bribery and Corruption Policy
- Board Diversity Policy
- Conflict Minerals Policy
- Environmental Policy
- Human Rights Policy
- Modern Slavery Statement
- Supplier Code of Conduct
- Group Tax Strategy
- Whistleblowing Policy