

## **Business Ethics Policy**

SmokeTec Limited is committed to ethical business practices, and it requires everyone who works for or with the company to share the responsibility for understanding and complying with the principles of ethical behaviour and carrying out business with integrity.

The objective of the Business Ethics Policy is to ensure that staff, partners and suppliers:

- Do not promise, offer, authorise, give or accept bribes or any other means of obtaining undue or improper advantage, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage;
- Do not offer or accept the receipt of gifts or hospitality that could influence or be perceived as capable of influencing the outcome of transactions or decisions relating to our business;
- Conduct and record business dealings transparently and accurately to prevent fraud and ensure the correct and proper payment of taxes;
- Take appropriate steps to prevent the laundering of money and the funding of terrorist or criminal activities;
- Will not enter into commercial agreements or engage in any other practice which may affect trade within a given market and have as their object or effect the prevention, restriction or distortion of competition within that market where such behaviour is prohibited by law.
  Furthermore, should SmokeTec Limited be in a dominant market position, it shall not engage in any behaviour which abuses that status within a given market where such abuse is prohibited by law;
- Do not engage in transactions on behalf of SmokeTec Limited with third party organisations or individuals with which they have an interest that conflicts, or could conflict, with the interests of SmokeTec Limited;
- Respect the privacy and/or personal information of everyone that SmokeTec Limited does business with or uses our products, including suppliers, customers, consumers, and employees;
- Do not lobby political parties or governments for business gain;
- Ensure that the transfer of technology and know-how is done in a manner that protects intellectual property rights wherever applicable;
- Comply with all and local export and import legislation;

- Do not disclose commercial information regarding suppliers, customers or partners where contractual or other legal duties restrict such disclosure.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. Where we discover a breach of this policy in our supply chain, we would consider this a breach of contract which could result in termination of that contract and a claim for damages arising.

Signed:

Christopher Fletcher.

Christopher Fletcher. B.Eng. (Hons). C.Eng. M.I.E.T. Director of SmokeTec Limited.