

CORPORATE SOCIAL RESPONSIBILITY POLICY



AMS Instrumentation & Control Ltd seek to be a good corporate citizen in everything that it does.

We have therefore determined to bring together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of the company operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards including the United Nations (UN) Universal Declaration of Human Rights, the UN Guiding Principles on Business & Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises established by the Organisation for Economic Cooperation and Development (OECD), the Rio Declaration on Environment and Development and the UN Convention against Corruption.

The AMS-IAC Board of Directors support the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards that set a common approach and provide practical guidance for our managers and employees on the ground.

Compliance, monitoring and reporting

Compliance with this policy will be continuously monitored and subject to review by the Directors of AMS Instrumentation & Control Ltd.

AMS-IAC management is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility.

Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or other mechanisms established by AMS Instrumentation & Control to report such breaches. We recognise that employees may be reluctant to report concerns for fear of retaliation and will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith.

The Directors of AMS-IAC will not criticise management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the company Code of Business Ethics, which is set out in Section 1. The other areas covered by this policy are Safety and Security (Section 2), Employment (Section 3), Customer and Community (Section 4) and Environment (Section 5).

SECTION 1

CODE OF BUSINESS ETHICS

This code applies to all the operations of AMS Instrumentation & Control and sets out the minimum standards which the Directors of AMS-IAC expect from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

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1.1 *Basic Standards of Conduct*

- (a) We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.
- (b) We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.
- (c) We will maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

1.2 *Employees*

AMS Instrumentation & Control:

- (a) is committed to creating and maintaining a safe and healthy working environment for its employees.
- (b) will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- (c) will respect the individual and each other's rights, customs and traditions including the right to freedom of association and the right to decide whether or not to join a trade union and will negotiate in good faith with the properly elected representatives of its employees.
- (d) will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- (e) will maintain good communications with employees through our information and consultation procedures.
- (f) will assist employees in realising their potential.

1.3 *Customers*

- (a) AMS Instrumentation & Control is committed to providing safe, value for money, high quality, consistent, accessible and reliable products and services to their customers.

1.4 *Shareholders*

- (a) AMS Instrumentation & Control will conduct its operations in accordance with the principles of good corporate governance.
- (b) We will provide timely, regular and reliable information on the business to all our shareholders.

1.5 *Business Partners and Stakeholders*

- (a) We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.
- (b) In those dealings, we expect our partners to adhere to business principles consistent with our own.
- (c) AMS Instrumentation & Control will conduct their operations in accordance with the principles of fair competition and applicable regulations.

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1.6 *Compliance with Law*

AMS Instrumentation & Control will comply with the laws and regulations applicable wherever they do business. Appropriate training will be provided for employees as necessary.

1.7 *Business Integrity*

- (a) AMS Instrumentation & Control will not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as, such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager.
- (b) AMS Instrumentation & Control accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- (c) No undisclosed or unrecorded account, fund or asset will be established or maintained.
- (d) AMS Instrumentation & Control will not facilitate, support, tolerate or condone any form of money laundering.

1.8 *The Environment*

- (a) AMS Instrumentation & Control is committed to making continuous improvement in the management of its environmental impact.
- (b) We will work with our partners to promote environmental care, increase understanding of environmental issues and disseminate good practice.

1.9 *Community Involvement*

- (a) AMS Instrumentation & Control strives to be a good corporate citizen and to fulfil our responsibilities to the societies and communities in which we operate.

1.10 *Conflicts of interest and confidentiality*

- (a) Whilst AMS Instrumentation & Control respects the privacy of its employees, all AMS Instrumentation & Control employees are expected to avoid personal activities and financial interests which could conflict with their responsibilities to AMS Instrumentation & Control.
- (b) AMS-IAC employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- (c) All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with an employee's line manager.
- (d) Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- (e) Where information is confidential, that confidentiality must be respected.

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SECTION 2

SAFETY AND SECURITY

2.1 Safety

The health and safety of our employees and customers is our paramount concern. Safety underpins all our operations.

We have developed the following high-level health and safety policy, which underpins all of our operational health and safety policies:

(a) General Statement

The Directors of AMS Instrumentation & Control are committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all its employees at work and also the safety of customers and others.

(b) This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. It is based on the principles that:

- All injuries can be prevented
- The goal is zero injuries
- Safety is the responsibility of all employees
- Working safely is a condition of employment

(c) The Managing Director and Directors of AMS Instrumentation & Control are tasked to ensure that so far as is reasonably practicable:

- There are adequate arrangements and organisation for health and safety in place within their area of responsibility
- Responsibilities for carrying out these arrangements are clearly allocated
- All staff are given appropriate information, instruction and training
- Adequate supervision is provided to ensure compliance with policies and safe systems of work
- All other legal and statutory duties on health and safety incumbent upon AMS Instrumentation & Control are complied with in all their operations.
- Adequate resources are allocated and competent persons are appointed to support the achievement of the above objectives.

(d) We will continually monitor the health and safety performance of our operations which will be subjected to periodic safety audits to assess performance.

The key safety principles with which all AMS-IAC employees are required to comply are set out below:

- Do not endanger yourself or others.
- Report any hazardous condition or practice that may cause injury to people property or the environment.

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- Obey all rules, signs and instructions.
- If you do not understand speak to your manager before you start work.
- Keep your work area clean and tidy.
- Disorder causes accidents, wastes time, energy and materials.
- Wear protective clothing and equipment as required.
- Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
- All accidents, incidents and near misses must be reported to your manager.
- Seek immediate help and first aid (if necessary).
- Do not adjust modify or repair any piece of work equipment unless you are competent and authorised to do so.
- Use only the correct tools and equipment for the job. Check that they are in good condition before use and use them safely.
- Before lifting, assess the load and your capability to move it.
- Make sure you get help with any heavy or awkward items and follow approved techniques.
- If you have any suggestions to improve safety in your workplace, tell your supervisor or manager.
- We also require contractors to comply with this policy whilst they are working at our premises.

2.2 Security

(a) General Statement

Security is a key issue for our customers, our staff and our business. We recognise the range of security issues which can arise and have implemented the following high-level security policy.

- (b) The Directors of AMS Instrumentation & Control are committed to ensuring, so far as is reasonably practicable, the security of customers, our employees at work and our property.
- (c) The threats to security are wide ranging, significant and, in the main, driven by external influences. The ability to control risks varies. However, we have the ability to address or mitigate all of the threats which apply. To be successful in this we need the co-operation and engagement of all our staff.
- (d) Security is an area in which we seek continuous development and improvement and compliance with existing and emerging legislation.
- (e) This statement provides guidance and direction to all employees on what is both required and expected of them. We are confident our staff will appreciate the reasons for this and the benefits to them, their colleagues and our property.
- (f) We aim to achieve, so far as is reasonably practicable:-
 - A secure environment for staff in their work
 - Security of our property
 - Security of our systems and processes

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This approach to security allows us to ensure we have a process to translate our policy into effective implementation within the organisation. It also allows us to formally recognise and demonstrate our commitment to the need for continuous development and improvement in this important aspect of our business.

We also require contractors to comply with this policy whilst they are working at our premises.

SECTION 3

EMPLOYMENT

In formulating its employment policies, AMS Instrumentation & Control Ltd are guided by the framework established by the Organisation for Economic Co-operation and Development (OECD) in its Guidelines for Multinational Enterprises. These Guidelines encourage companies to foster openness, sustainability and respect for employee rights. Our employment policies cover all employees of AMS Instrumentation & Control.

3.1 *Equal Opportunities and Diversity Policy*

- a) The Directors of AMS Instrumentation & Control are committed to equality of opportunity both in the provision of services to the public and as an employer. This policy sets out AMS-IAC's commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.
- (b) We are committed to seeking continuous improvement and compliance with legislation based on the following principles.
 - Everyone has the right to be treated with dignity and respect.
 - We will not discriminate on the grounds of race, colour, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, HIV status, family status, social origin, trade union activity or any other factor.
 - We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.
 - All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times.
 - Non-compliance with this policy will be treated seriously and will not be tolerated.
- (c) The Directors of AMS Instrumentation & Control are required to ensure:
 - They create a productive and safe working environment, promoting diversity and inclusion in their workforce.
 - They develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and
 - They can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.

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Legislation and Codes of Practice

- (d) We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

Partner Organisations

- (e) We are committed to actively working with partner organisations to ensure our policies, procedures and practices are in line with best practice.

Practices and Standard Operating Procedures

- (f) AMS Instrumentation & Control will put in place practices and standard operating procedures to ensure the commitments in this policy are applied and implemented throughout the organisation.

Access to Company Premises

- g) We will take all reasonable steps to ensure that our buildings and premises are accessible to disabled employees, customers and visitors as required by the Disability Discrimination Act (DDA) in the United Kingdom.

Access to Information

- h) We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

Recruitment

- l) All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavour to ensure there are no barriers to employment of suitable candidates.

Staff Training

- j) We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

Complaints

- k) Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimisation has the right to pursue the complaint through our grievance procedures. Customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

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Reporting

- l) We are committed to monitoring and reporting on our actions and achievements in relation to implementing this Diversity Policy both internally and externally.

Audit

- m) We are committed to ensuring that our operations comply with the requirements of this policy and will periodically audit its implementation.

3.2 *Data Protection*

AMS Instrumentation & Control fully understands its obligations to ensure that personal information is treated fairly, lawfully and correctly, and is committed to achieving compliance with the laws of the General Data Protection Regulation (GDPR).

SECTION 4

HUMAN RIGHTS

AMS Instrumentation & Control supports the principles of the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business & Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. We will adhere to the following principles in respect of our staff.

- a) We will treat all employees fairly and honestly and will have agreed terms and conditions in accordance with law or practice and will be given appropriate job skills training.
- b) We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.
- c) Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- d) We will not employ illegal child labour, forced or bonded labour, forced overtime or condone illegal child labour.
- e) Employees have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management. Furthermore we support the right of our employees to exercise that right through a secret ballot.
- f) We will negotiate in good faith with the properly elected representatives of our employees.
- g) We will abide by the non-discrimination laws in every country where we operate.
- h) We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.
- i) We have formal grievance procedures through which staff can raise personal and work-related issues.
- j) All staff will be given reasonable access to bathroom and rest facilities.

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SECTION 5

CUSTOMER AND COMMUNITY

5.1 Customers

AMS Instrumentation & Control is a specialist in the manufacture and supply of process instrumentation products and services to key industries predominantly within the Oil and Gas, Transport and General Process sectors.

AMS-IAC work in accordance with ISO9001 Quality Standards, and are working towards several further key accreditations that allow them to meet the quality and environmental expectations of the industries in which we operate; these include UKAS OSHAS 18001, ISO14001 and Achilles B2 verification for the utilities industries.

From assistance in product selection to lifetime care contracts, AMS Instrumentation & Control will always work with you to ensure you have our full support and provide “clarity when you need it most”.

We will

- act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our products and services.
- provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden.
- not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair.
- respect customer privacy and protection for personal data in accordance with the relevant law.

5.2 Suppliers

Ethical Purchasing Policy

- (a) We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain.
- (b) We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardised human rights, safety or the environment.
- (c) We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.
- (d) More specifically we expect our suppliers to:
 - Adhere to business principles consistent with our own.

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- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
- Seek to maintain continuous improvement in their supply chain relationship with us.
- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

(e) We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties.
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

5.3 Community

Our relationships with the local communities are very important to us and are an essential part in the growth of our business.

Through our community strategy, we therefore engage with the community at a range of levels as employers, neighbours, potential employees, businesses and residents. Through our community strategy, we seek to play our part in promoting socially inclusive policies, encouraging the young and disadvantaged and helping older members of the community and the disabled.

In line with our core values, our community strategy incorporates the following elements:

- engagement with the local communities in which we operate.
- offering employment opportunities to all sectors of the community through non-discriminatory policies and promoting opportunities to disadvantaged and vulnerable groups;
- promoting engagement between our staff and the community;
- supporting local community groups and charities;
- improving the environment in and around our operations;
- promoting broader opportunities for workplace learning;
- supporting local initiatives for the development and education of young people in the areas we serve; and

In addition, we provide support to community-based charities and projects including support for employees' efforts in fund raising and for small-scale projects.

SECTION 6

ENVIRONMENT

6.1 Environmental Policy

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AMS Instrumentation & Control Ltd recognises that its operations could result in emissions to air and water, the generation of waste and consumption of natural resource and therefore realise the importance of environmental protection. The company has devised an environmental control system and are committed to operating its business responsibly and in compliance with all environmental regulations, legislation and approved codes of practice relating to its industry and activities. It is the company's objective to operate with, and to maintain good relations with all regulatory bodies.

It is the company's declared policy to carry out all measures reasonably practicable to meet, exceed or develop all necessary or desirable requirements and to continually improve environmental performance through the implementation of the following:

- Assess and regularly re-assess the environmental effects of the Organisation's activities
- Assess and regular re-assess the Organisations environmental objectives and targets
- Training of employees in environmental issues
- Minimise the production of waste
- Minimise material wastage
- Minimise energy wastage
- Promote the use of recyclable, sustainable and renewable materials
- Manage the disposal of waste materials
- Reduce and/or limit the production of pollutants to water, land and air
- Minimise the risk to the general public and employees from operations and activities undertaken by the Organisation

Our policy is to strive to achieve continual improvement in environmental performance.

6.2 *Climate Change Policy*

Climate change is recognised as an international issue with national governments on both sides of the Atlantic committed to taking action to reduce greenhouse emissions. We emit greenhouse gases from operating our company vehicles and contribute to greenhouse gas emissions through our operations. At the same time we have a role in supporting governments and communities to reduce the impacts of climate change by minimising where possible the use of company vehicles, purchasing fuel efficient vehicles and seeking ways to improve the energy efficiency of our operations where possible and practical.

We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies.

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To work actively to improve the fuel efficiency of our vehicles.
- To report annually on our greenhouse gas emissions from all vehicles and property in our ownership.
- To actively promote improved energy efficiency and fuel efficiency within our business.

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- To stay abreast of alternative fuel and energy developments and continue to assess their commercial viability.

6.3 Biodiversity Policy

Our policy in respect of conserving and promoting biodiversity reflects our commitment to furthering the aims of sustainable development in the management and development of our business. All businesses affect biodiversity through the use of resources and discharge of waste products. This Biodiversity Policy is therefore consistent with our broader Environmental Policy, which includes a stated commitment to minimise the environmental impacts of our operations and prevent pollution.

Our policy is to strive to enhance biodiversity where practicable.

Accordingly our commitments are:

- Where we operate from sites which are designated as being of importance due to their natural habitats, we will work with the relevant authorities and affected parties to ensure protection of these habitats through effective pollution control measures and management plans with the aim of conserving or enhancing the biodiversity of these sites.
- Where we are involved in the development of new sites, we will comply with all relevant statutory requirements and guidelines in respect of designated areas on any of our development sites. Where significant areas of landscaping are proposed, we will aim to promote biodiversity through, for example, sensitivity of planting taking account of any local biodiversity networks or action plans.
- Where we consider it appropriate to do so, we will support the implementation of the UK Biodiversity Action Plan and Local Biodiversity Action Plans defining areas which require special protection and management to ensure that biodiversity is maintained. We will seek to do this in partnership with the relevant authorities and affected parties, who promote biodiversity on a local and national level and seek to identify ways in which we may be able to support the development of selected schemes or initiatives.

Signature:

A handwritten signature in black ink that reads 'Matt Harford'.

Name: Matt Harford
Company Director