

BUSINESS ETHICS POLICY

The INDUCHEM GROUP

INDUCHEM Ireland INDUCHEM UK Ltd INDUCHEM Engineering Services

Expert People. Best in Class Product. Exceptional Service.

The Induchem Group is committed to ensuring that its business is conducted in all respects according to ethical, professional and legal standards.

Our values are Integrity, Flexibility and Excellence.

This document defines the objectives of our business ethics policy and sets out the principles and values that we will support and be guided by in the conduct of our business and in our relationships with our employees, partners and anyone conducting business on our behalf.

1. In all our business activities we will

- Comply with all applicable legislation, rules and regulations
- Engage in honest and ethical conduct, including the ethical handling of actual or apparent conflict between personal and professional relationships
- Maintain effective procedures to prevent the misappropriation or misuse of confidential information
- Comply with our policy on gifts and money laundering
- Maintain accurate company records to help prevent their occurrence

2. Dealings with our employees

We acknowledge our staff as our most valuable asset in achieving our goals and treat them accordingly with dignity and respect; their honesty, reliability and commitment are integral to our business.

3. Dealings with our customers

The Induchem Group is committed to providing and sustaining the highest level of customer service.

To this end we will :

- Treat all customers fairly and openly
- Respect the confidentiality of information that we might obtain and retain in relation to customers
- Take all reasonable care to avoid untruths, concealment and overstatement in advertising and other public communications
- Operate an effective feedback process to deal with situations where these standards are challenged

4. Dealings with our shareholders and other investors

We seek to establish long-term relationships based on mutual understanding and trust.

To this end we will :

- Provide timely and truthful financial information in accordance with statutory and regulatory requirements
- Communicate business policies, achievements and prospects honestly

5. Dealings with our suppliers and service providers

We are committed to developing relationships with suppliers of goods and services based on mutual trust and shared values.

To this end we will :

- Maintain high standards of integrity in our business relationships
- Ensure that all employees conduct business in a professional manner
- Encourage suppliers and service providers to operate with values and principles equivalent to ours

6. Dealings with our competitors

We are committed to competing in a lawful manner.

To this end we will :

- Avoid disclosing proprietary or confidential information in any contact with competitors
- Not attempt to acquire information regarding a competitors' business by any unlawful means

7. Dealings with the community

We acknowledge the interdependency between the success of our business and the well-being of the communities in which we operate.

To this end we will :

- Aim to build strong, balanced, long-lasting and vibrant relationships
- Endeavour to make a positive long-term contribution to the quality of life of the community and take into account the concerns of the wider community, including both national and local interests
- Actively engage with local communities to ensure we understand their needs and aspirations

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Cathal O'Mahony Managing Director Induchem Group

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