

### *Introduction*

Micrometric Ltd is a component manufacturer that provides bespoke parts to a variety of industries. We specialise in manufacturing parts with laser processes as well as with a range of machine tools and sub contract operations. We operate in selected niches in the market for advanced technology products. Our customers primarily operate in the manufacturing industry. We have about 35 employees on one site. Our operations are based on close, long-term relationships with customers, suppliers and other business partners, and we seek to be perceived as a credible, long-term and reliable partner. Our business shall be conducted in line with the principle of long-term, soundly-based development. As well as being subject to business economic requirements, goals and guidelines, our business activities shall also be conducted in accordance with strict criteria in terms of integrity and ethics.

The Code applies not only to our own operations but also to our relationship with our suppliers of products and services. Our ambition is to work with our suppliers toward the goals of achieving positive change. Our long term aim is to ensure that all suppliers to our company live up to the Code. However, we appreciate that certain adjustments take time. At the same time, we expect a continuous striving for improvement.

As a minimum, we observe all applicable laws and regulations and where necessary will also introduce standards in accordance with this Code, where laws and regulations do not align with the Code's objectives. We expect that in their operations suppliers maintain knowledge of and as a minimum requirement observe national legislation in the countries where they conduct their business.

Responsibility for ensuring that day-to-day operations are managed in accordance with our Code of Conduct rests with the Managing Director.

### *Working conditions*

We seek to be a respected employer. Micrometric Ltd shall provide a healthy working environment, physically and socially, and shall strive to be an attractive employer with regard to the personal development of its employees. Relationships with and between employees shall be based on mutual respect and dignity, and shall also provide reasonable degree of influence in areas affecting the working situation of the individual.

### *Working environment*

We seek a constant improvement in health and safety in the workplace and work to provide our employees with a safe working environment. We will as a minimum strictly observe national laws and/or collective bargaining agreements.

Suppliers shall as a minimum observe applicable laws and regulations concerning the working environment and working conditions. We also demand that our suppliers prioritise the health and safety of their employees and furthermore expect that suitable provision is made for safety, that equipment and buildings are safe and that hazardous materials and waste are dealt with safely.

### *Pay and work*

The terms and conditions of employment, including financial compensation and working hours, that are offered to our employees shall at least meet the minimum requirements of national legislation, or shall accord with relevant standards in the locations where we conduct business.

Suppliers shall apply working hours and pay wages and overtime compensation at least in accordance with national laws and agreements, or in accordance with standard practice in local industry.

***Equal opportunity***

We advocate change and development and take the view that this is not possible to achieve in a workplace that does not offer equal opportunity. Against that background, we strive for a situation in which the Micrometric's employees are offered equal opportunity for development, training, compensation and terms and conditions of employment, irrespective of gender. In cases where compensation gaps exist between men and women, we shall make active efforts to even these out. We also strive for a more equal gender balance at recruitment.

***Discrimination***

We strive for a non-discriminatory culture based on responsibility and respect. We are convinced that good results, job satisfaction, commitment and cooperation are achieved through diversity, and the Micrometric's employees are offered equal opportunities for development, irrespective of gender, age, ethnic or national background, religion, sexual disposition, disability or other distinguishing characteristics. The company does not permit any discrimination or harassment in any form. This also applies to our Suppliers.

***Forced labour***

We do not accept human trafficking, forced labour, work unwillingly performed or unpaid work in any form. This includes agreements made under forced conditions and illegal workforces. Furthermore, we do not accept methods that restrict the free movement of employees, and no person may be kept at work for any time against that person's will. This also applies to our suppliers.

***Child labour***

No person below the age for having completed compulsory schooling or below the age of 15 years may be employed. If it is found that a child is working at one of our suppliers, we request action to be taken to remedy the problem, provided that such action does not lead to a worsening of the child's social situation. Should shortcomings still exist after the supplier has been given reasonable time and opportunity to remedy such shortcomings, the supplier shall be replaced. We do support education and the supporting of children by providing work experience in a properly supervised and regulated environment and we encourage suppliers to do likewise.

***Disciplinary measures***

Employees shall be treated with respect and dignity. No employee may in any circumstances be subject to physical punishment or any other form of physical, sexual, psychological punitive measure, harassment or compulsion. No deduction from wages may be made as a disciplinary measure, unless governed by collective bargaining agreement or approved by law. This also applies to our suppliers.

***Freedom of association.***

Employees shall be free to exercise their legal right to be members of, organise or work for organisations that represent their interests as employees. Suppliers shall not expose employees to threat or harassment, or otherwise limit or interfere in employees' legal and peaceful exercise of their rights.

***Political involvement***

We maintain neutrality towards political parties and candidates. Neither the name of Micrometric Ltd nor any other resources whatsoever under the control of Micrometric shall be used to promote the interests of political parties or candidates.

***Relationship with the community***

Micrometric works toward the aim of exercising a positive social influence in our community. Business decisions that may be assumed to affect the community at large shall wherever possible, be preceded, or followed at the earliest opportunity, by discussions with representatives of the community in order to identify any need for joint actions.

### *Environmental policy*

The Environmental Policy expresses Micrometric's will to play its part in achieving sustainable development and a better environment. We work proactively to continually reduce our direct and indirect environmental impact.

Important decisions shall take due account of environmental consequences in order to create long-term value for the Micrometric's customers, employees, shareholders and the community at large. Environmental activities shall also be conducted within the scope of our mission and shall be closely integrated into operational activities. This implies that in the long term the whole lifecycle of the products and services we supply shall be taken into account. We can maintain a comprehensive view of environmental issues through a high level of competence among our employees and by constantly developing our knowledge of environmental consequences. Environmental conservation measures shall be implemented to the extent they are technically feasible, reasonable from a business economic viewpoint and environmentally justified.

Suppliers are encouraged to operate in line with our environmental policy. Suppliers shall also be familiar with and observe requirements defined by national legislation, statutes and industry standards. Suppliers shall as a minimum requirement operate a secure system for management of hazardous materials and waste.

### *Conflict materials*

Micrometric supports the initiatives to reduce conflict in some countries by responsible sourcing of relevant minerals. We buy very small quantities of alloys containing metals that might be from conflict zones. We will buy our materials from reputable materials suppliers that also have a conflict minerals policy.

### *Anti-corruption*

Micrometric Ltd does not accept corruption, bribery or unfair, anti-competitive practices. All sales and marketing of our products and services shall be conducted in accordance with relevant laws and regulations in the country concerned.

We shall not act in breach of applicable laws on competition. We do not participate in cartels or other non-permissible cooperation with competitors, customers or suppliers. If Micrometric Ltd is contacted with any suggestion of non-permissible cooperation of this kind, such contact shall be reported to Micrometric's management.

We shall not offer or make inappropriate payment or other remuneration to any person or any organisation in order to induce the person or organisation to establish or maintain a business relationship with our Group. We shall not, directly or indirectly, request or accept any form of inappropriate payment or other remuneration provided in order to establish or maintain a business relationship with our company. In order to prevent conflicts of interest, our employees shall only give or receive gifts or services that do not conflict with relevant law, that are in line with general business practice and that cannot reasonably be regarded as constituting bribes.

We respect other companies' assets and protect our tangible and intangible assets from loss, theft, infringement and misuse.

### *Communication*

We maintain an open dialogue with those who are affected by the Micrometric's operations. We reply to questions from outside interests and communicate with the parties concerned correctly and efficiently. Questions may be asked via [sales@Micrometric.co.uk](mailto:sales@Micrometric.co.uk)

### *Application*

Managers of Micrometric Ltd shall be familiar with this Code of Conduct, as well as relevant national legislation and regulations, and shall be responsible for ensuring that they are observed within their area. The Managing

Director will be responsible for ensuring that the suppliers of the respective company are familiar with and accept the Code. All employees of Micrometric are responsible for ensuring that they themselves act in accordance with the values and business principles represented in the Code. Micrometric Ltd's management is responsible for ensuring that work relating to the Code is a continuous process, and for documenting and communicating how we ourselves and our suppliers meet its requirements.

#### *Follow-up*

Every employee of Micrometric Ltd is responsible for reporting to management any cases of fraud or other criminal behaviour. Any confirmed infringements of our Code of Conduct will lead immediately to disciplinary actions, including dismissal in the event of serious deviation from the guidelines. Employees who are uncertain as to whether specific behaviour may conflict with the Code shall consult with their immediate superior.

We reserve the right to conduct unannounced inspection and follow-up of every supplier to check compliance with this code of conduct. If a supplier does not carry out stipulated improvements within the period of time agreed, despite being called on to do so and despite an action plan having been agreed, we will terminate our working relationship with that supplier.

#### *Responsibility for employees*

The Managing Director is responsible for communicating the content and purpose of this Code of Conduct within the organisation and for encouraging employees to report circumstances that may conflict with the Code's rules. Reports of infringements of the Code may be made anonymously and in confidence to [neilmain@Micrometric.co.uk](mailto:neilmain@Micrometric.co.uk), or by mail. Individuals who in good faith submit a report will not be subject to any punishment or other adverse consequences. Failure to observe the rules set forth in this code of ethics may result in disciplinary measures.