

## **SDI Group Plc ('SDI' or 'the Group')**

### **ETHICS POLICY**

Graticules Optics Ltd is part of SDI Group PLC and complies with all SDI business policies.

SDI expects all employees and third parties acting for and on behalf of our *Group* to observe the highest standards of ethics, integrity and self-respect at all times and for the duration of their relationship with/employment by the *Group*.

#### **SCOPE**

This policy applies to all activities of the *Group*. It applies to all staff including Directors, Managers, Contractors, Employees ("all", "everyone", "staff"). All staff must be familiar with and comply with this policy.

#### **OUR BUSINESS VALUES**

The SDI Group considers the following values as important:

- Accountability: to colleagues and our stakeholders in all that we do
- Honesty, transparency and respect: in our day to day working lives with each other and all our stakeholders
- Passion for innovation: continuing to work on our products to keep them relevant for our customers as well as innovating in how we work on a daily basis
- Sustainability: considering sustainability in all that we do
- Partnership: working closely with each other, our customers and stakeholders to deliver the best possible outcomes
- Agility: being able to move fast.

#### **RESPECT**

##### **DIVERSITY, EQUITY AND INCLUSION**

We are an equal opportunity employer and are committed to providing a workplace that is free of discrimination and all types of abusive, offensive or harassing behaviour. Our aim is to create a diverse and balanced workforce - one free of discrimination and prejudice, whether that be in the recruitment process, as part of the ongoing individual review processes or the way in which the team works together. Everyone will be treated with respect and will be given equal opportunity in every aspect of their working role irrespective of their:

- age;
- disability;
- gender;
- marital status;
- pregnancy;

- race;
- religion;
- sex;
- sexual orientation.

## **FAIRNESS**

We aim to pay close to, or above, the average salary for the roles that our employees carry out. We are also keen to work with suppliers who have a similar attitude. At the extreme end of this, we are aware that modern slavery exists and that it is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships.

## **ETHICAL CONDUCT**

### **COMPLIANCE**

Our commitment to integrity begins with complying with all relevant laws, rules and that apply to us. Furthermore, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or company policy, we should seek the advice from our professional advisers. We are all responsible for preventing violations of law and for speaking up if we see a possible infringement through the relevant reporting lines/whistleblowing procedures.

### **COMPETITIVE BEHAVIOUR**

We are committed to ethical, fair and vigorous competition. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services.

### **INFORMATION HANDLING**

Part of our operations means that we must ensure the protection of confidential company information, as well as non-public information entrusted to us by employees, customers and other business partners. For definitions, please see the relevant policies within the SDI Group Employee Handbook. We will not disclose confidential and non-public information without a valid business or legal purpose and then not without proper authorisation.

### **CONFLICTS OF INTEREST**

It is our policy to conduct all of our business in an honest and ethical manner that is compliant with law and regulation. We are committed to acting professionally, fairly and with integrity in all our

business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter inappropriate conflicts of interest.

### **GIFTS/HOSPITALITY**

Giving and receiving gifts, services and hospitality could leave us open to accusations of unfairness, bias or deceit. We therefore have a clear and transparent culture when it comes to gifts and hospitality issues.

We operate a Gifts and Hospitality register in which gifts or hospitality worth over £100 must be recorded. The recording of gifts and hospitality offered or received is an important aspect of our procedures for preventing bribery and corruption within its business.

### **LOBBYING / ADVOCACY**

If undertaken, we will be transparent about our lobbying activities and disclose all lobbying expenditures as required by law. Furthermore, we will not support, or have memberships in, organisations that lobby for policies or actions that would undermine our core values, including progress toward a socially just, economically inclusive and environmentally restorative society.

### **INVESTMENTS**

We do not invest in organisations whose policies, actions, advocacy, products or services undermine progress toward sustainability goals. We will conduct thorough due diligence on all potential investments to ensure that they meet our ethical standards and that they align with our values and mission. We will regularly review and evaluate our investment portfolio to ensure that it is consistent with this policy and our commitment to sustainability.

### **CUSTOMER / COMMUNITY CONCERNS**

We prioritize the health and safety of our customers and the communities potentially impacted by our operations. We will take all necessary steps to address any concerns related to our products or services raised by such customers and communities.

We have established clear and accessible channels for customers and community members to raise concerns, provide feedback, and seek information about our products or services. This will usually be to the local site Managing Director. We will respond to customer and community concerns promptly and professionally, and seek to address them in a timely and effective manner.

### **USE OF COMPANY RESOURCES**

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace. Employees are trusted to behave responsibly, use good judgment to conserve company resources and act in an environmentally responsible

manner. Generally, we will not use company equipment in the conduct of an outside business or in support of any religious, political or other outside daily activity.

Mike Creedon  
Chief Executive Officer

Ami Sharma  
Chief Financial Officer

[26/4/2023]