

ETHICS POLICY STATEMENT OF Ergonomic Solutions International Limited and Subsidiary Companies

Ergonomic Solutions (ES) expects the highest standard of ethical conduct and fair dealing in its relationship with its employees, customers, shareholders, consultants, partners, suppliers, government agencies, competitors and with the local communities in which we operate.

The purpose of this policy is to provide guidance to staff, consultants, directors, officers, agents and stakeholders in assessing the many and sometimes complex decisions they have to make. It will signal to all that they can have confidence in what ES does and the way it is done.

GUIDING PRINCIPLES

As one of our core values is integrity by which we mean: to be honest and ethical in our actions, communications and our use of resources. The following principles provide the ethical framework to which we aspire. Our principles are:

In relationships with others

- Treat colleagues, stakeholders, customers, suppliers and the public respectfully, professionally and fairly.
- Take account of confidential issues when appropriate.
- Deal courteously with everyone including those who hold opinions that differ from ours.
- Do not discriminate against anyone on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age.

In our work

- Operate with honesty and integrity in all our work, taking steps to identify and deal with corrupt business practices and professional misconduct.
- Be open and transparent in making decisions and undertaking activities on behalf of ES.
- Reach conclusions based on best business, commercial and professional practice, having considered all views.
- Comply with all relevant laws and regulations, for example:
 - Observe the applicable national labour law regulations
 - Observe prohibition of Child Labour as defined by United Nations Conventions.
 - Prohibit all forms of Forced Labour.
 - Comply with local legislation covering Bribery and Corruption and the principles set out in the EU Policy against Corruption COM (2003) 317 final.

- Employees, Consultants and Stakeholders should seek to avoid situations where personal interests might or might appear to be in conflict with the interests of ES.
- Any situation which gives rise or might give rise to a conflict of interest with ES should be disclosed.
- Ensure business decisions are transparent and based on objective assessment.
- Recognise appropriately the intellectual, professional and operational contributions of others.

Impact on the environment

- ES is committed to minimising the adverse impacts of our decisions and actions on the natural environment, on people and their welfare.

SCOPE

- The policy applies to all aspects of our governance, policy, research, commercial, operational and administrative activities.
- All those covered by the policy are personally accountable for operating within the scope and intent of the policy.
- It covers all ES staff, consultants, directors, officers and agents in all offices and facilities wherever they operate.
- We expect those organisations that provide products, goods and services to us to respect this policy.
- We request customers, partners and distributors that we work with to respect our ethical positions.

Implementation

All those covered by the policy are responsible for ensuring that activities for which they are responsible comply with this policy. People should raise concerns about applications and procedures, or administrative and support activities, with line managers in the first instance. Similarly, clear breaches of the ethical policy should be referred to managers. Existing mechanisms within ES should be used to resolve concerns or refer onwards as appropriate. Serious or unresolved concerns should be referred to the Board Ethics Committee.

The Board Ethics Committee and monitoring procedures

The Ethics Committee is a small team comprising the Chairman, and three Board members of whom at least one is a Non-Executive Director. Serious issues which cannot be resolved via existing mechanisms may be referred to the Board Ethics Committee at any time. Breaches of the policy which cannot be dealt with by line management may also be referred to the Board Ethics Committee. The Board Ethics Committee may then convene, with appropriate additional expertise if needed, to consider the issue. The Board Ethics Committee's findings will be accountable to the ES Group Board. The ES Directors will report annually on any ethical issues or activities through the normal audit procedures to ensure our policy is being applied consistently.