

## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

### **APPLICABLE TO JUDGES SCIENTIFIC plc AND ALL ITS SUBSIDIARIES**

Judges Scientific plc (“Judges” or “the Company” and, together with its subsidiaries “the Group”) seeks 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 Group’s 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 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 Judges Board of Directors supports the principles set out in those codes and standards and the aim of this policy statement is to translate that support into a set of guidelines and standards that set a common approach for Group companies and provide practical guidance for our directors, managers and employees on the ground.

#### **Compliance, monitoring and reporting.**

Compliance with this policy will be continuously monitored and subject to review by the Judges Board. Each local director/manager is responsible for ensuring that the principles set out in this policy statement are communicated to and understood and observed by all employees and others representing the Group and for ensuring compliance in his or her area of responsibility. Any employee who reasonably suspects that there has been a breach of this policy must report it to his or her line manager, senior management or through other mechanisms established by the Group to report such breaches (for example, using the Judges Scientific Whistleblower Hotline – see Section 6 of this policy statement). The Company recognises 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.

All sections of this policy statement are underpinned by the Group’s 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). Details of the Whistleblower Hotline are given in Section 6.

## **SECTION 1 CODE OF BUSINESS ETHICS**

This code applies to all of the operations of the Group and sets out the minimum standards which the Judges Board expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

### **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 take into account 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**

Each Group company:

(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;

(d) will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications, abilities and enthusiasm needed for the job to be performed;

(e) will maintain good communications with employees through our information and consultation procedures; and

(f) will assist employees in realising their potential.

### **1.3 Customers**

Judges Scientific is committed to providing safe, value for money, high quality, consistent, accessible and reliable products and services to its customers.

### **1.4 Shareholders**

(a) The Group will conduct its operations in accordance with the principles of good corporate governance.

(b) The Group will provide timely, regular and reliable information on the business to all its 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) Group companies will conduct their operations in accordance with all applicable regulations.

## **1.6 Compliance with Law**

All members of the Group 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) No Group company shall offer, give, seek or receive, either directly or indirectly, improper inducements or 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 make or accept an offer, that employee should discuss the issue with his or her manager or a more senior executive.

(b) Group 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) The Group will not facilitate, support, tolerate or condone any form of money laundering.

## **1.8 Conflicts of interest and confidentiality**

(a) Whilst Judges respects the privacy of its employees, all Group employees are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the Group.

(b) Group 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.

(f) Judges is an AIM-listed company. Insider dealing (i.e. trading or encouraging others to trade its shares whilst in possession of unpublished price-sensitive information) is a criminal offence. Observing the Judges Scientific Share Dealing Code (copy available through Head Office) protects employees from inadvertent insider dealing and protects the company's reputation; even innocent trading at the wrong time can compromise the trader and sabotage the trust of the financial community in a quoted company.

## **SECTION 2 WELLBEING & SAFETY**

### **2.1 Safety**

The general wellbeing, health and safety of our employees and customers is our paramount concern. Safety underpins all our operations and our central motto is “If you cannot do it safely, don’t do it”. 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 Judges Board is committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all of 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; and
- working safely is a condition of employment.

(c) The Directors of Judges Scientific plc and the subsidiary Managing Directors (“the nominated directors”), 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 the Group are complied with in all their operations and locations;
- performance targets are set to achieve a step change in safety performance; and
- 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 subject to periodic safety audits to assess performance. The nominated directors will:

- present health and safety updates to the Judges Board at each meeting; and
- report to the Judges Board all fatal and notifiable injuries to staff or other persons within 8 hours.

The nine key safety principles with which all Group employees are required to comply are set out below.

1. Do not endanger yourself or others.
  - Report any hazardous condition or practice that may cause injury to people property or the environment.
2. Obey all rules, signs and instructions.
  - If you do not understand speak to your manager before you start work.
3. Keep your work area clean and tidy.
  - Disorder causes accidents and wastes time, energy and materials.

4. Wear/use personal protective clothing and equipment as required and as directed by local policy.
  - Keep it in good condition, wear it correctly and ask for a replacement if it becomes damaged or unfit for use.
5. All accidents, incidents and near misses must be reported to your manager.
  - Seek immediate help and first aid (if necessary).
6. Do not adjust modify or repair any piece of work equipment unless you are competent and authorised to do so.
7. Use only the correct tools and equipment for the job.
  - Check that they are in good condition before use and use them safely.
8. 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.
9. 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.

## **SECTION 3 EMPLOYMENT**

In formulating its employment policies, Judges is 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 the Group.

### **3.1 Equal Opportunities and Diversity Policy**

a) The Judges Board is committed as an employer to equality of opportunity. This policy sets out the Group'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) Everyone has the right to be treated with dignity and respect. We are committed to seeking continuous improvement and compliance with legislation based on the following principles:

- we will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor that does not interfere with the task;
- 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; and
- non-compliance with this policy will be treated seriously and will not be tolerated.

(c) The Judges Board and the Managing Directors of the separate business units of the Group are required to ensure:

- that they create a productive and safe working environment, promoting diversity and inclusion in their workforce;
- that they develop new practices, as appropriate, to ensure all employees, contractors and customers are treated fairly; and
- that they can demonstrate continuous improvement in practices to promote diversity and equal opportunities for all.
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(d) Legislation and Codes of Practice. We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries in which we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

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

(f) Each division and operating company will put in place practices and standard operating procedures to ensure the commitments in this policy statement are applied and implemented throughout the organisation.

g) Access to Company Premises. 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

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

j) Recruitment . 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.

k) Staff Training. 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.

l) Complaints. 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 procedures can be accessed and used by everyone. Information regarding our Whistleblower Hotline is given in Section 6.

### **3.2 Human Rights**

Judges supports the principles of the United Nations Universal Declaration of 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, regardless of where they work. All staff will have agreed terms and conditions in accordance with local 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) we will abide by the non-discrimination laws in every country where we operate.

f) 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;

g) we have formal grievance procedures through which staff can raise personal and work-related issues; and

h) all staff will be given reasonable access to WC and rest facilities.

### **3.3 Data Protection**

We will comply with the relevant principles governing data protection in each country in which we operate.

## **SECTION 4 CUSTOMER AND COMMUNITY**

### **4.1 Customers**

We have a wide-ranging network of customers based around the world that use our products to further their studies or to test their products or services in a number of fields. We will:

- act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services;
- respect the human rights of our customers – our security and revenue protection arrangements are consistent with international standards for law enforcement;
- 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; and
- respect customer privacy and provide protection for personal data in accordance with the relevant local law.

### **4.2 Stakeholders**

We are committed to maintaining open and regular dialogue with all our stakeholder groups in matters that affect their interests. These range from formal consultation to regular informal contact on a day-to-day or week-to-week basis.

### **4.3 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;
- 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; and
- 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; and
- improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

## **SECTION 5 ENVIRONMENT**

### **5.1 Environmental Policy**

Judges seeks at all times to minimise the impact of the Group's day-to-day operations on the environment.

## **SECTION 6 WHISTLEBLOWER HOTLINE**

6.1 Judges provides a confidential telephone hotline. Any party who is affected by issues covered in this Corporate Social Responsibility statement of policies and who has concerns that it is not being properly observed may call this telephone hotline. A message will be taken by an agency operating wholly independently from members of the Group. Callers may identify themselves or remain anonymous, though investigation of a complaint may be hampered if the caller chooses to remain anonymous.

6.2 The telephone agency will pass to the Chairman of Judges a confidential note of all messages received. The Chairman will be responsible for determining what specific further action is required.

**6.3 The whistleblower hotline number is 01342.888699**