



Business Management System
Sicame UK Code of Conduct

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Document Summary

Sicame UK Business Management System

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Sicame UK Code of Conduct

Document Owner:
HR Manager: Hayley Hopper

Document Author(s):
HR Manager: Hayley Hopper

Document Approver(s):
Managing Director: Ian Steel



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Document Change History

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Document Change History:

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Each time a controlled document is revised, the following information should be added to this table:

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1 Purpose

This Code of Conduct summarises our ethical commitment. It offers guidelines and policies that define how we run our business. It will help deliver consistently high standards of conduct throughout the Group, reinforcing our reputation around the world. We expect our business partners, as well as our employees, to act with similarly high ethical standards.

2 Scope

The Code should help our employees and business partners identify and avoid situations that might violate legislation and best practice. Understanding the relevant laws around the world is not always easy but this Code, encompassing Sicame UK's policies on Bribery and Corruption and Conflicts of Interest, covers the major areas. It cannot deal with every circumstance so if it does not give you enough guidance about how to deal with a particular situation, consult your manager, director or the Sicame UK HR Manager.

Compliance with the Code is not only of concern to Sicame UK, the business, but also to each employee. For example, bribery is illegal and will expose the business to prosecution, fines and loss of reputation. However, it could also expose employees personally to penalties including fines and, in extreme cases, even imprisonment.

If you are aware of any employee or operation involved in illegal acts or acting contrary to the Code of Conduct, you must immediately report it to your manager, director or the Sicame UK HR Manager. If you have any concern over how your complaint might be handled by your line manager, please use the Whistleblowing policy.

Compliance with the Code is mandatory across the company worldwide. We all share responsibility for ensuring that individually and collectively we are complying with this Code. I know that I can count on your support and will always do what I can to support you in doing the right thing.

3 Referenced and Supplementary Documents

Throughout this Code of Conduct you will find certain terms used which have the following meanings:

Sicame UK or Group - Sicame UK Ltd and any or all of its subsidiaries.

MD - Managing Director.

Associated Person - Someone (an individual or a business) who performs services for or on behalf of Sicame UK. This can include:

- Officers and employees.
- Parent or subsidiary companies.
- Joint ventures.
- Agents, contractors and consultants depending on their contractual terms.

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Public Official - A person who either:

- Holds a legislative, administrative or judicial position of any kind, appointed or elected, of a country or territory.
- Exercises a public function for or on behalf of any country or territory, or for or on behalf of any public agency or public enterprise of that country.
- Is an official or agent of a public international organisation, such as the UN.

Additional sources of information

Each section of the Code may have a reference to additional sources of information, usually Sicame UK policy or procedure notes, which expand on the Code. These additional notes are available from the Sicame UK Intranet.

If you do not have Intranet access, copies of the documents can be obtained from your manager or MD.

Referenced Documents:

- Whistleblowing Policy

4 Roles and Responsibilities

Specific roles and responsibilities are detailed within the main body of the Policy and Procedure contained in section 5.

5 Process/ Procedure/ Work Instruction

5.1 Introduction to the Sicame UK Code of Conduct

5.1.1 What is it?

- The Code sets out the ethical standards that should govern the activities of Sicame UK and its subsidiaries, its employees and its business partners.
- It gives guidance on recognising when and where ethical problems exist and how to avoid them, or what to do if they cannot be avoided.

5.1.2 Why do we need it?

There are three main reasons for having a Code of Conduct:

To raise the profile of ethical issues.

- You need to recognise an ethical problem exists before you can deal with it.
- The Code highlights the main areas where ethical problems occur so that everyone knows what to look out for.

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To ensure a consistent response to ethical issues.

- As a business operating in global markets Sicame UK recognises that countries around the world have different local business cultures.
- Because Sicame UK p.l.c. is UK based, all of our operations (and their employees) are governed not only by the bribery and corruption laws of the countries where they operate but also by UK legislation, which applies to the worldwide activities of all UK based or UK controlled companies.
- This Code applies to all of our subsidiaries and employees around the world so that, whatever the local business practice, we adopt consistently high ethical standards.

To provide guidance in specific situations.

- The laws and regulations dealing with ethics and corruption around the world are varied and complex and ignorance is no defence.
- Following this Code should mean that legal (and best practice) compliance is achieved consistently.

5.1.3 Who does it apply to?

- It applies to all Sicame UK operations, their officers and employees.
- Sicame UK's business partners need to be made aware of the Code and should apply broadly similar ethical standards in their operations.

5.1.4 Where does it apply?

- Sicame UK operates worldwide and this Code applies to all its worldwide operations.

5.1.5 When does it apply?

- It applies at all times.
- Newly acquired companies will adopt the Code from the date they join Sicame UK.

5.1.6 What happens if someone breaches the Code?

- Non-compliance is a very serious matter. It can lead to civil or criminal sanctions against Sicame UK, its employees and business partners. It can also lead to:
 - Internal disciplinary action for employees, up to and including dismissal.
- Immediate termination of any agreement with a business partner.

5.1.7 Getting more information or clarification

Questions on the application of the Code which cannot be resolved locally should be addressed to the Sicame UK HR Manager.

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5.2 What is Bribery?

5.2.1 Principles

Bribery is a criminal offence, defined as:

“the offer, promise or gift of a financial or other advantage, with the intention of inducing or rewarding the improper performance of a function or activity.”

It does not matter if:

- the person offering the bribe is the person who will benefit from the improper performance.
- the person receiving the bribe is the person who will carry out the improper performance.

5.2.2 Policy

The Group, from the Sicame UK p.l.c. Board down, has a zero-tolerance attitude towards bribery and corrupt practices in all its business dealings. Such practices are never acceptable and will not be tolerated. Therefore:

- You should never accept a bribe.
- You should never seek to influence the actions of a third party toward Sicame UK by offering or paying a bribe.
- You should never ask or authorise an Associated Person or any other business partner to offer or pay a bribe on your behalf.

5.2.3 Guidance

At its most basic level, a bribe is an improper financial payment such as a kickback. However, because a bribe actually involves the offer of an advantage, there are actions beyond a simple payment which might be seen as corrupt. For example:

- Giving or receiving excessive hospitality and gifts (*see page 10*).
- Making inappropriate charitable donations (*see page 12*).
- Making or providing political payments and support (*see page 14*).
- Making facilitation payments (*see page 16*).
- Making payments to intermediaries disproportionate to the service provided (*see page 18*).

5.2.4 Key Questions

You should always consider the reasons underlying any action and if you have any doubts about its legality or purpose, ask yourself these two questions:

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- Would I be happy to justify my position if the details of this appeared in a national newspaper?
- Would I be happy if I found out that my main business competitor was doing this?

If the answer to either of these questions is no, then there are clearly concerns and you should seek guidance from your manager, MD or the Sicame UK HR Manager before proceeding.

If you have a concern:

- Get a better understanding of Group policy by reading the appropriate policy, procedure and explanatory notes (see additional sources of information below).
- Raise it with your manager, MD or the Sicame UK HR Manager.
- If you feel that you cannot talk to them, follow the Whistleblowing policy (*see page 20*).

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5.3 Entertainment, Gifts and Promotional Spend

5.3.1 Principles

Gifts and entertainment are useful for building and maintaining relationships between business partners. However, they may be seen as creating a conflict of interest by placing the recipient under an obligation to the giver, making them more likely to favour the giver in business decisions. This is particularly the case if spend levels are excessive or unreasonable compared to the status of the recipient or to local business customs.

5.3.2 Policy

- You should never directly ask for a gift or hospitality.
- Reasonable gifts, hospitality and other promotional expenditure may be both provided or accepted so long as they:
 - Have a clear business purpose.
 - Are appropriate to the seniority of the recipient and are in line with local business customs.
 - Are not intended to influence the recipient's actions toward the giver.
 - Do not contravene local laws or the recipient's own Code of Conduct.
 - Are visible - properly authorised, recorded and accounted for.

5.3.3 Guidance

There is nothing wrong or inappropriate about giving or receiving small gifts or reasonable entertainment and hospitality - the difficulties come in judging what is appropriate and what is not. Key to this are purpose, value and visibility.

Purpose

- Any gift or hospitality should be seen as a straightforward way of building or maintaining the relationship. If there is any chance it will be perceived as a means of influencing or rewarding the recipient then it should not be offered or accepted. Therefore, it is better to avoid giving or receiving gifts or hospitality at key points during negotiations.
- There should be a business purpose to hospitality. Employees from both the giver's and the recipient's organisations should be at any event, otherwise there is no scope for business discussion.
- Hospitality should normally be restricted to employees who have a direct connection to the business purpose of the activity.

Value - reasonable or excessive?

- Gifts should never be cash or cash equivalents.

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- Gifts should be small tokens, ideally incorporating some form of marketing message, and should not normally exceed GBP 100 or local currency equivalent in value.
- Entertaining and hospitality should not normally exceed GBP 250 or local currency equivalent per head and the events should not normally last more than a day.
- No-one should receive frequent or multiple gifts or hospitality as a way of exceeding limits.
- Any requirement to pay or accept travel or accommodation expenses must have prior approval from your MD.

Visibility

- Exceeding the above limits for gifts and hospitality, whether giving or receiving, needs the prior approval of your MD, who will also be required to enter the details, including the justification for the item, into a register. Your manager or MD will also be required to sign any expenses claim you make which includes such substantial spend before the claim is settled.
- You should account for the cost of all gifts and entertainment you provide using the company's standard expenses reporting and approval process. You need to make certain the spend is properly analysed and include adequate detail, explanation and justification of the claim.

5.3.4 Key questions

- If you have any doubts about the legality, purpose, or value of a gift or hospitality, ask yourself these four questions:
 - Will it be seen as being intended to influence the recipient's business decision?
 - Is it prohibited by local laws or the recipient's Code of Conduct?
 - Does the value or nature mean I feel uncomfortable about accepting it?
 - Does its value or nature mean that I need my MD's approval before I offer (or accept) it?

If the answer to any of these questions is yes, seek guidance from your manager, MD or the Sicame UK HR Manager before proceeding.

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5.4 Charitable Giving

5.4.1 Principles

Supporting charities is a good and positive thing to do but it is not really part of Sicame UK's corporate role. Rather than making corporate decisions about the merits of worthwhile causes, Sicame UK would rather ensure that its stakeholders receive the best possible rewards so allowing them to individually support their personal interests.

Charitable payments can pose problems if they are seen as a way of channelling funds to reward a third party by supporting their favoured cause.

5.4.2 Policy

Sicame UK has no large-scale charitable giving programme but there is no prohibition on low-level local giving, provided that donations:

- Are small compared to the size of the business, normally less than GBP 250.
- Are to a registered charity, or a well-recognised and independent equivalent, whose purpose benefits a wide section of the population rather than a few individuals.
- Are not made in expectation of reward.
- Do not contravene local legislation.

There is no intention to prevent employees continuing to organise their own fund-raising activities and charitable giving programmes. These should continue to be agreed with local management.

5.4.3 Guidance

It is important that there is proper visibility and approval of this type of expense, therefore:

- Charitable donations within the above levels need your MD to sign off the payment.
- Donations that do not meet these criteria must have MD signoff and be recorded in a register.
- Donations must be properly recorded in the accounting records and correctly shown in financial reports.

5.4.4 Key questions

If you have any doubts about whether a charitable donation is appropriate, ask yourself these questions:

- Am I satisfied that this is a bona fide charity?
- Is the charity independent of any business relationship?
- Is the donation allowed by local legislation?



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If the answer to any of these questions is no, then you should not offer the donation without first seeking guidance from your manager, MD, or the Sicame UK HR Manager.

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5.5 Political Payments and Involvement

5.5.1 Principles

Sicame UK is a non-political organisation and so supporting local political activity, either by making donations or by other forms of involvement, is difficult to justify. Relationships with politicians and other public officials are also likely to be questioned as to their underlying purpose, especially if the person has influence in areas where the company has activities. However, there is a place for proper political lobbying where the intention is to openly convey the company's views and concerns to policy makers.

5.5.2 Policy

- Sicame UK's policy is straightforward:
- There is a total prohibition on political payments of any kind by or on behalf of the Group.
- The use of lobbying organisations to represent Sicame UK's views is permitted provided they are independent and the relationship is properly authorised by your MD.
- Using politicians or public officials as consultants, or employing them after leaving office, requires careful consideration and authorisation before any relationship is agreed.
- You are welcome to participate in your local political process as an individual citizen but you must not involve your employment or company in that participation.

5.5.3 Guidance

A political payment is "a contribution, in cash or in kind, aimed at supporting a political cause."

"Political cause" can include:

- A political party (or equivalent).
- Party affiliated organisations.
- Party aligned research and lobby groups.
- Individual politicians.
- Individual candidates.

"Contributions" include:

- Loans, pledges, gifts, dues and subscriptions.
- Fees or tickets for conferences, dinners or other fund-raising events.

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- Payment for advertising in publications where the main purpose is fund raising rather than commercial.
- Payments to charities, lobbying firms and other organisations that channel funds to political parties or individuals.
- The provision of services at anything other than a full commercial rate and for bona fide business purposes to political parties or individuals.
- The release (paid or unpaid) of employees to undertake political campaigning work.

5.5.4 Key questions

If you have any doubts about a proposed payment or relationship, ask yourself:

- • Is the recipient a political party or cause?
- • Is this a relationship with a public or political figure?
- • Will this payment or relationship be perceived as a way of seeking undue influence?
- If the answer to any of these questions is yes, then you should seek guidance from your manager, MD or the Sicame UK HR Manager before making the payment or starting the relationship.

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5.6 Facilitation Payments

5.6.1 Principles

Facilitation payments are “small unofficial payments made to secure or speed up the performance of a routine or necessary action to which the payer already has legal or other entitlement.” These are common in some parts of the world and are not always illegal under local legislation but they are bribes and should not be paid.

They are typically demanded in cash by the recipient (usually a public official) using their official position. Examples are:

- Payments to clear goods through customs.
- Payments to allow entry/exit to/from a country when all documentation is in order.
- Payments to prevent delay to an order.

The definition does not catch official fees and charges, such as document filing fees, or the cost of an enhanced service, for example express visa processing, provided the transaction is open, transparent and supported by an official receipt.

5.6.2 Policy

Facilitation payments are bribes and under the company’s bribery and corruption policy they are not acceptable. Sicame UK is committed to working, alone and with others, toward their elimination.

They should not be paid by Sicame UK employees and we should not authorise business partners to pay them on behalf of Sicame UK. Sicame UK will support any employee or business partner who refuses to make a facilitation payment.

5.6.3 Guidance

In some countries and sectors these types of payment are widespread. Simply saying that an issue is unacceptable will not make it go away; it requires firm action taken by everyone affected.

You should strongly resist any demand for a facilitation payment and Sicame UK will fully support your actions.

Use techniques such as:

- Carrying a local language card on business trips stating the company’s policy and pointing out that making such payments is against UK law.
- Taking detailed notes of conversations where payments are demanded.
- Asking for written evidence that the payment is officially required.

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- Requesting an official receipt for any payment, including details of the recipient's name and identity number.
- Demanding confirmation from the supervisor/manager of the person making the demand.
- Asking to contact your company to discuss the issue and the line to be taken.
- Asking to contact the local embassy/consulate to discuss and report the issue.

If, despite using these techniques, you are still met by the demand and you feel there is a threat of physical violence, loss of liberty, or of some other adverse effect on your personal well-being, you should make the payment. You should then immediately report it to your manager and MD, who will then report it to the appropriate authorities.

Any facilitation payments made, even under duress, should be properly recorded and analysed in the company's financial records and reports.

You should also report any demands that were successfully resisted so that the incidence of these demands can be monitored and successful defence strategies identified.

5.6.4 Key questions

If you are travelling to, or doing business in, a country where there is a known problem with facilitation payments, ask yourself:

- Do I adequately know how to resist demands?

If the answer is no you should discuss the position with your manager, MD or the Sicame UK HR Manager.

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5.7 Business Relationships

5.7.1 Principles

Sicame UK is involved in many business relationships, from those which are totally arms length with customers and suppliers to those where a business partner is acting on behalf of Sicame UK, such as with agents, contractors, consultants and other intermediaries - those defined as “Associated Persons” in the Glossary. Sicame UK could become involved with corruption due to the actions of these business partners, in particular Associated Persons.

5.7.2 Policy

Sicame UK believes that the basic principles of honesty and openness that it adopts in its dealings should also be adopted by its business partners who should be aware of Sicame UK’s position as set out in this Code of Conduct.

Business partners should never be asked or authorised to do something on Sicame UK’s behalf that is contrary to this Code of Conduct.

All relationships should be governed by a contract, whether it is the straightforward Supplier/Customer relationship covered by Terms of Sale/Purchase, or a more specific contract such as an agency or distributor agreement. Contracts should refer to the Sicame UK Code of Conduct.

5.7.3 Guidance

Before entering into any relationship, it makes sense to understand something about the operations involved, particularly with Associated Persons. Therefore, it is important that you carry out an appropriate level of investigation or due diligence work to assess their background and identify any concerns.

When agreeing any contract, you should pay particular attention to the level of remuneration and the method of payment to ensure that these are in line with normal commercial practice and the level of skill and activity needed.

5.7.4 Key questions

- The following are important questions in relation to business relationships:
- Will the business partner be seen as an “Associated Person”, i.e. someone acting on behalf of Sicame UK?
- Has due diligence or anything you know or may have heard highlighted any business or ethical issues with the business partner?
- Is there a formal contract in place defining the relationship?
- Does that contract refer to the Sicame UK Code of Conduct?
- Does the contract include any unusual terms relating to compensation or payment?



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If any answer gives you concern you should discuss the position with your manager, MD or the Sicame UK HR Manager.

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5.8 Accuracy of Recording and Reporting

5.8.1 Principles

The financial and other records of the company form the basis of both statutory reporting and also the periodic reports used by managers to understand business activity and plan for the future. Errors in recording transactions, for whatever reason, mean that management decisions can be based on an incorrect view of the situation with potentially serious business consequences. Deliberate falsification, often used to try to conceal a corrupt action, may also be fraudulent in its own right and could lead to civil or criminal liabilities, both for the perpetrator and for Sicame UK itself.

5.8.2 Policy

Sicame UK will comply with all laws, regulations and rules relating to record keeping and reporting that apply in each country where it operates. It has policies, procedures and controls, supported by formal reviews and internal audit, to ensure that compliance is achieved.

5.8.3 Guidance

There is never any justification for mis-recording or mis-reporting. Trying to hide wrong-doing in anything but the very short term is unlikely to be successful and, while the consequences of owning up may be considerable, the consequences arising from disclosure of a cover-up are inevitably far worse.

Sicame UK has in place a wide range of policies, procedures, reporting and control processes aimed at ensuring that recording and reporting is accurate and complete. These run from basic items such as standardised documentation, segregation of duties, authority and approval processes through to periodic financial reviews and Internal Audit.

In addition, each MD and FD is required to certify each year that they have maintained proper controls over their businesses.

5.8.4 Key questions

The following are important questions in relation to accurate recording and reporting:

- Am I aware of any mis-analysis or mis-recording in my company's records?
- Am I aware of any breakdown in the approval or other control processes?

If the answer to any of these is yes you should discuss the position with your manager, MD or the Sicame UK HR Manager.

5.9 Conflicts of Interest

5.9.1 Principles

A conflict of interest occurs when the judgement of an employee or Associated Person is affected by their external activities or relationships, which may come into direct or indirect conflict with their Sicame UK role or the activities or interests of the Group.

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Conflicts of interest should be avoided where possible. If unavoidable they must be disclosed and managed.

5.9.2 Policy

Sicame UK recognises that employees have a right to take part in legitimate financial, business and other activities outside their Group role. However, to the extent that these other activities might affect their ability to carry out their Sicame UK role, or affect (or potentially be perceived by others to affect) their judgement, objectivity or loyalty to the Group, they must be disclosed and potentially terminated.

5.9.3 Guidance

Conflicts are most likely to arise in two areas - other business activities and personal relationships.

Other business activities:

- You should disclose any business activity you undertake outside the Group to your MD and obtain their formal approval if you wish to continue with it.
- You should obtain your MD's approval before accepting any position as an officer or director of another business, even as a non-executive director.
- You must not work with, or for, a business that is a competitor, a customer of, or a supplier to, any Sicame UK or Sicame Group company.
- You should not have a financial interest in any Sicame UK competitor, customer or supplier (except for normal shareholdings in publicly-listed companies).
- You should not take part in any decision-making process involving Sicame UK and another business that employs a close family member.

Personal relationships:

- Open and friendly relationships between colleagues help create a good working environment. However, individual relationships which become too close can lead to a perception of lack of objectivity or preferential treatment, especially if there is an immediate reporting relationship, and are best avoided.
- You should avoid personal relationships that may conflict with your role or position within Sicame UK - for example if you have a buying role within Sicame UK it would be inappropriate for you to have a close personal relationship with someone on the sales team from a major supplier.
- Conflicts should be avoided if at all possible, but if they do occur, the key things are:
 - Recognise there is a conflict.
 - Disclose it to your MD.
 - Withdraw from any decision-making process affected by the conflict.

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5.9.4 Key questions

The following are important questions in relation to conflicts of interest:

- Do I have to choose between Sicame UK and something/ someone else when making this decision?
- Would disclosing the relationship to my work colleagues cause me embarrassment?
- Is this personal relationship influencing my business decisions?
- Am I recruiting, managing, or appraising a friend or family member?

If the answer to any of these is yes you should discuss the position with your manager, MD or the Sicame UK HR Manager.

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6 Appendices

6.1 Sicame UK Code of Conduct Employee Acknowledgement Signature

I acknowledge that I have received and read a copy of the Sicame UK Code of Conduct.

I understand the importance of the Code as a way of communicating Sicame UK's commitment to ethical business activity and agree to comply with the Code's requirements at all times.

Name:

Position:

Signed:

Date:

7 Records

This section is not applicable.

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