



**Seetru Limited**

*That's Safety!*

# Code of Conduct

This Code of Conduct forms a fundamental part of the relationships with our suppliers and our distributors

**Ethics**  
**Respect** Responsibility  
**Social Responsibilities** Environmental  
**Integrity** **Code of Conduct** Sustainable  
**Honesty** Health and Safety  
**openness** Principles **Behaviour** Values **Due diligence**  
 professional  
**Compliance** Data Protection Human Rights  
 Moral Standards

# The Seetru Organization

## CODE OF CONDUCT

### 1 Introduction

The Seetru Organization consists of Seetru Ltd, Leser UK Ltd and Blupax Engineering and Industrial Private Ltd., it also includes Seetru Engineering Services which is an operating division of Seetru Ltd.

All our suppliers and our distributors must comply with this Code of Conduct. This Code of Conduct forms a fundamental part of the relationships with our suppliers and our distributors. Violation of this Code of Conduct may result in termination of the business relationship. Our suppliers and distributors must endeavour to ensure that their contractual partners also comply with the provisions of this Code.

### 2 Social Responsibilities

Social responsibilities support the long term sustainability of a business, and society more generally; they include:-

- Standards of Behaviour, human rights and the rule of law
- Health and Safety
- Environmental protection and Sustainability

In this regard our suppliers and distributors are required to uphold the principles of the UN Global Compact.

#### 2.1 Ethics

Honesty, integrity, openness, professionalism and respect for people and our environment must be underpinning principles. All operations must be to the highest ethical and moral standards. Business objectives must be pursued with integrity and in complete compliance with both the letter and the spirit of all laws; there are no exceptions.

#### 2.2 Human rights

The following shall be complied with:-

- All forms of illegal, forced or compulsory labour, slavery and servitude are prohibited;
- No individual shall be induced through force, threats, or deception to provide services or benefits of any kind to another or to enable another to acquire, in such a manner, benefits of any kind;
- No individuals, groups or organizations shall be involved in the Trafficking of humans. Trafficking means:
  - ◊ Recruiting, transporting, transferring, harbouring, receiving, transferring or exchanging control, or otherwise arranging or facilitating travel of any individual who is travelling while at risk of being exploited through any type of forced or compulsory labour or slavery or servitude.

#### 2.3 Modern Slavery

The following shall be complied with:-

- Elimination of child labour: all employees shall have reached the minimum age required for work in the relevant jurisdiction.
- Elimination of discrimination: of any kind in respect to hiring, employment and occupation practices.
- Elimination of all forms of personal harassment.
- Compliance with applicable laws and regulations relating to:
  - ◊ Working hours, days of rest and safe working conditions; and
  - ◊ Employee rights and wage levels.

## 2.4 Bribery and Corruption

Bribery is a criminal offence. We require compliance, from everyone connected with our business, with the highest ethical standards and all applicable international anti-bribery / anti-corruption laws. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind.

## 2.5 Financial Integrity, Prevention of Tax Evasion and Money Laundering

There must be zero tolerance toward all forms of tax evasion and / or money laundering and these shall be prohibited absolutely whether committed or facilitated by employees of your company or anyone acting on your behalf.

## 2.6 Conflict Minerals, US Dodd-Frank Act and Supply Chain Due Diligence

Seetru wish to have supply chain transparency and to facilitate responsible mineral sourcing so as to ensure that our use of minerals in our products does not directly or indirectly finance or benefit armed groups who perpetrate human rights abuses. The minerals subject to these provisions include:-

- Tin
- Tantalum
- Tungsten
- Cobalt
- Columbite-Tantalite (coltan)(source of Tantalum)
- Cassiterite (source of Tin)
- Wolframite (source of Tungsten)
- Derivative metals of the above minerals

Should any of the above minerals be required in our products or production it is our policy that, where these minerals might originate from, or were processed in, any of the following countries:-

- Democratic Republic of Congo
- Angola
- Burundi
- Central African Republic
- Republic of Congo
- Rwanda
- South Sudan
- Tanzania
- Uganda
- Zambia

Our supplier must use their best endeavours to trace the original source of supply and confirm that the supply is not supporting armed groups who perpetrate human rights abuses.

## 2.7 Due diligence

Due Diligence must be undertaken in all aspects of the execution of business in order to ensure discharge of all responsibilities: legal and regulatory responsibilities as well as moral and commercial responsibilities.

## 2.8 Health and Safety

Duties under the UK Health and Safety at Work etc. Act 1974 and the accompanying protective legislation (or equivalent local national legislation / regulations) must be complied with so as:-

- To provide and maintain a safe place of work, safe systems of work, safe equipment and a healthy and safe working environment.
- To ensure that hazards are identified and regular assessment of risks are undertaken.
- To provide information, instruction, training and supervision as is necessary to ensure employees and others are assured of a safe and healthy working environment.
- To promote the awareness of health and safety and encourage health and safety best practice.
- To ensure appropriate protective and preventative measures are taken.
- To ensure that there is access to competent advice so as to secure compliance with statutory duties.

## 2.9 Environmental

All applicable Environmental Laws and Regulations must be met or exceeded, and a precautionary approach to environmental risks must be taken. The following Environmental Objectives are required:-

- Conserve energy, water and resources, minimising use of natural resources and impact on the environment.
- Reuse and recycle where possible and economic, changing to renewable resources where practicable.
- Adopt good practice with regard to the reduction of waste, minimising the need for treatment, disposal or emissions.
- Use raw materials and dispose of waste in a safe environmentally acceptable manner.

## 2.10 Sustainable Procurement

It is widely accepted that the way we live now is having a detrimental effect on the quality of our lives and the environment in which we live. We need to look seriously at the way we use the earth's resources and operate our businesses.

Sustainable Procurement is thus about meeting business needs today without adversely affected the ability of others in the future to meet their needs: i.e. it is about the deliberate inclusion of public interest into our corporate decision making and honouring of the triple bottom line: People, Planet and Profit. Good procurement practices and ethical supply chains must be developed and operated.

## 3 Counterfeit, Fraudulent and Suspect Items

Only genuine original equipment manufacturer products shall be used and / or supplied.

## 4 IT and Information Security

Policies and practices shall be in place so as assure IT security, information security and business continuity.

## 5 Data Protection

All applicable data protection regulations must be complied with. Confidential business data relating to the business of the Seetru Organisation must be kept secure and not used or disclosed to third parties without prior consent.

## 6 Compliance, monitoring and reporting

Monitoring and report processes must be operated to ensure continual compliance with the requirements of this Code of Conduct.

Confirmation of agreement and compliance:

Company Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

BMD 001.002  
Revision 1, Reviewed 20 June 2018

**Please print this document, fill out your details and return via EMAIL to:  
[edward.flint@seetru.com](mailto:edward.flint@seetru.com)**