



## Vulcan Seals Business Code of Conduct

### Introduction

At Vulcan Seals, we are committed to conducting business with integrity, transparency, and respect for all stakeholders. This Code of Conduct sets out the principles and standards expected of all employees, contractors, and business partners. It reflects our core values of **Service, Quality, Value and Integrity**, and aligns with our corporate policies on ethics, anti-bribery, data protection, human rights, modern slavery, and social responsibility.

### 1. Compliance with Laws and Regulations

We operate responsibly and in compliance with all applicable laws and regulations in every country where we do business. Illegal or unethical behaviour will not be tolerated under any circumstances.

### 2. Business Integrity

- We prohibit bribery, corruption, and fraudulent practices. Employees and agents must never offer, condone, or authorise payments, gifts, or inducements to secure improper business advantages.
- Facilitation payments are unacceptable, even in jurisdictions where they are customary. Any such requests must be reported immediately.
- Entertainment and hospitality may only be offered or accepted if modest, lawful, and not intended to influence business decisions.
- All transactions must be accurately recorded, with genuine supporting documentation. Undisclosed or unrecorded accounts are strictly prohibited.

### 3. Anti-Bribery and Corruption

We fully comply with anti-bribery laws, including the UK Bribery Act and the U.S. Foreign Corrupt Practices Act. Any involvement in bribery or corrupt practices will result in disciplinary action, including termination of employment or business relationships.

### 4. Data Protection and Privacy

- We respect the privacy of individuals and handle personal data responsibly, in line with UK Data Protection legislation.
- Personal data will be collected only for legitimate purposes, kept accurate and up-to-date, and retained only as long as necessary.
- We will protect personal data against unauthorised access, disclosure, loss, or theft.
- Questions or concerns about data protection should be directed to the Compliance Committee at [louise.ebdon@vulcanseals.com](mailto:louise.ebdon@vulcanseals.com).

### 5. Human Rights

- We respect and uphold universal human rights and avoid complicity in human rights abuses.
- We treat all employees fairly and without discrimination based on race, gender, age, religion, disability, sexual orientation, or any other protected characteristic.
- We prohibit harassment, abuse, and any form of degrading treatment in the workplace.



- We maintain a safe and healthy working environment and take all reasonable steps to prevent accidents and injuries.

## 6. Modern Slavery and Human Trafficking

- We have a zero-tolerance approach to modern slavery and human trafficking in our operations and supply chain.
- We implement effective systems and controls to prevent, detect, and address modern slavery risks.
- Suppliers must comply with our standards and contractual prohibitions against modern slavery.
- Employees are encouraged to report any concerns through our whistleblowing hotline.

## 7. Social Responsibility

- We strive to have a positive impact on society and the environment through sustainable practices.
- We support education, mentorship, and community development initiatives.
- We uphold ethical excellence in all business dealings and expect the same from our supply chain.
- We ensure health and safety standards are met and personal rights are respected.

## 8. Conflicts of Interest

Employees must avoid situations where personal interests conflict with the interests of Vulcan Seals. Any potential conflicts must be disclosed to management promptly.

## 9. Reporting Concerns

Employees are encouraged to report any suspected violations of this Code or related policies to their line manager or HR. Reports will be handled confidentially and without retaliation.

## Acknowledgment

All employees and business partners must read, understand, and comply with this Code of Conduct. Failure to adhere may result in disciplinary action or termination of business relationships.