



Policy title: <b>Siamo Group Ethics Policy</b>		
Approved by: Craig Golby		
Position: Managing Director		
Signature: 		
Version no: 2	Revision date: 19/09/2025	

### Introduction

Siamo Group is committed to placing ethics at the core of our operations and we expect our employees and business partners to ensure that they are acting ethically at all times.

### Scope

This policy applies to the entire Siamo Group. It covers all employees, managers, contractors and business partners.

### Aims

This policy upholds our commitment to conducting business fairly and refraining from any form of corruption, and possible harm to our internal and external stakeholders: Particularly money laundering, bribery, solicitation of gifts, and data security breaches.

We want to ensure fair competition based on equal treatment on the market.

### Commitments: Objectives

To further uphold our commitment to trade ethically Siamo Group is committed to:

- All employees understand their responsibility for maintaining Siamo Group Data Protection protocols, to ensure all data held at Siamo Group is secure and properly protected.
- We uphold our commitment to conducting our business fairly and with zero-tolerance of any form of corruption, which including money laundering, bribery, and the solicitation of gifts, donations, or any other benefit.
- We uphold our commitment that whistle blowing helps us to prevent practices which undermine our company policies or procedures



### Commitments Targets

Our commitments will be achieved through specific targets:

- 100% of all Siamo Group direct employees complete Siamo Group's annual GDPR training.
- 100% of all Siamo Group direct employees to read and sign and Siamo Groups Data Protection policy.
- Zero incidents of money laundering activities entering Siamo Group's financial system
- Zero confirmed incidents of bribery by Siamo Group direct employees.
- Zero confirmed incidents of Siamo Group direct employees soliciting gifts, donations, or any other benefit.
- Annually promote our Siamo Group Whistleblowing Policy to 100% of all Siamo Group direct employees.

### Roles and Responsibilities

All employees, workers, and contractors of Siamo Group are responsible for maintaining ethical working practices and uphold the commitments of this policy.

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All employees have a responsibility to report, to their line manager or the HR team, any concern that one of our employees, suppliers or contractors is violating this Ethics Policy; and that reporting should take place at the earliest opportunity.

The Support Services and HR team is responsible for reviewing our progress with its stated targets, developing the business ethics policy and proposing annual objectives to the Board of Directors. It must also identify best practices and tools that the company can use to help achieve its commitments.

### Policy Review

This policy is reviewed yearly against our progress with its stated targets, updated yearly and approved by a member of the board of directors. All changes will be communicated to all Siamo Group internal and external stakeholders.

Siamo Group has identified the following policies as part of our ongoing commitment to human rights:

- Data Protection policy
- Anti Money Laundering policy
- Gift, Donations and Hospitality policy
- Anti Bribery policy
- Whistleblowing policy

### Consequences of failing to comply with this policy

Siamo Group takes compliance with this policy very seriously. Failure to comply puts individuals and Siamo Group at risk.

The importance of this policy means that failure to comply with any requirement may lead to disciplinary actions under our Disciplinary and Grievance Policy which may result in dismissal.

### Declaration

Name	
Job Title	
Date	

I hereby confirm that I have read and fully understand the terms of the Siamo Group Data Protection Policy. I agree to comply with the policy at all times and confirm that I understand how to raise concerns about any potential breach of this policy. I understand I have the right to receive regular training and updates on data protection.

Signed	
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