



Code of Ethics



Lambert Engineering - Code of Ethics

Introduction

At Lambert Engineering, we believe that how we conduct our business is as important as the products, services and solutions we deliver.

This Code of Ethics establishes the principles, standards and behaviours expected of our employees, directors, contractors, suppliers, customers, agents and all third parties who work with or on behalf of Lambert Engineering.

The Code reflects our commitment to operating responsibly, ethically and in compliance with applicable legislation, regulations and industry standards. It supports our reputation as a trusted engineering partner and forms an important part of our governance framework.

Compliance with this Code is a condition of employment and a key expectation of those conducting business with Lambert Engineering.

Our Values

Our values underpin every decision we make and every relationship we build.

TRUST

- How we treat each other.
- Trust is the foundation of how we work together.
- We rely on the competence and judgment of every colleague, partner and customer and honour the trust placed in us.

ACCOUNTABILITY

- How we treat our commitments.
- We do what we say. We commit, we deliver and we own the outcome.
- We speak honestly, even when it is difficult.

RESPECT

- How we treat the world we build.
- We respect the planet, the people and the systems our work touches.
- We build for sustainability and honour everyone in the value chain.

SHARED INTELLIGENCE

- How we treat knowledge.
- Knowledge does not belong to one company.
- We bring the full intelligence of the group to every customer, every decision and every problem.
- What one of us learns, all of us know.

CHALLENGE

- How we treat the present to prepare the future.
- We do not accept what works today as the limit.

- We challenge ideas, limits and ourselves to find what is next.

We expect all employees and business partners to:

- Comply with all applicable legal requirements.
- Act ethically and responsibly at all times.
- Maintain accurate business records.
- Cooperate with regulators and authorities where required.
- Report suspected breaches of law or ethical standards.

No commercial objective shall justify unlawful or unethical conduct.

Anti-Bribery and Corruption

Lambert Engineering maintains a zero-tolerance approach to bribery and corruption.

We comply with the requirements of the UK Bribery Act 2010 and expect the same standards from all third parties.

We do not permit:

- Bribes in any form.
- Facilitation payments.
- Improper commissions.
- Undisclosed conflicts of interest.
- Improper gifts, entertainment or hospitality intended to influence a business decision.

All gifts and hospitality must be reasonable, proportionate, lawful and transparent.

Business decisions must always be based on merit, quality, service, value and legitimate commercial considerations.

Conflicts of Interest

A conflict of interest arises where personal interests could improperly influence business decisions.

Employees and business partners must:

- Avoid situations that create actual or perceived conflicts.
- Declare potential conflicts promptly.
- Refrain from participating in decisions where impartiality may be compromised.

Business relationships must be conducted in the best interests of Lambert Engineering and its stakeholders.

Human Rights and Modern Slavery

Lambert Engineering is committed to protecting human rights and maintaining ethical labour practices throughout its operations and supply chain.

We do not tolerate:

- Forced labour
- Child labour
- Human trafficking
- Modern slavery
- Exploitation of workers
- Inhumane treatment

We are committed to:

- Fair wages and working conditions.
- Freedom of association.
- Equal opportunity.
- Safe working environments.
- Respect for human dignity.

Suppliers and contractors are expected to maintain equivalent standards and comply with applicable modern slavery legislation.

Equality, Diversity and Inclusion

We are committed to providing an inclusive environment where everyone is treated fairly and with respect.

We do not tolerate discrimination on the basis of:

- Age
- Disability
- Gender
- Gender reassignment
- Marriage or civil partnership
- Pregnancy or maternity

- Race, nationality or ethnic origin
- Religion or belief
- Sexual orientation
- Any other protected characteristic

Employment, recruitment, development and promotion decisions are based on merit, capability and business needs.

Respect at Work and Prevention of Harassment

Everyone has the right to work in an environment free from bullying, harassment, intimidation and victimisation.

Lambert Engineering prohibits:

- Bullying
- Sexual harassment
- Third-party harassment
- Discrimination
- Abuse of authority
- Offensive or intimidating behaviour

This expectation applies across all work-related activities, including:

- Company premises
- Customer sites
- Business travel
- Conferences and exhibitions
- Social and networking events
- Electronic communications

Breaches may result in disciplinary action, termination of contracts or removal from company premises.

Health, Safety and Wellbeing

Nothing is more important than the safety and wellbeing of our people and those affected by our activities.

We are committed to:

- Providing a safe and healthy working environment.

- Managing risks effectively.
- Preventing injury and ill health.
- Supporting physical and mental wellbeing.
- Promoting a positive safety culture.

Everyone has a responsibility to:

- Follow safety procedures.
- Use equipment correctly.
- Report hazards and near misses.
- Stop unsafe acts where reasonably practicable.

Safety must never be compromised for commercial or operational reasons.

Confidentiality, Data Protection and Information Security

We protect confidential information belonging to:

- Customers
- Suppliers
- Employees
- Business partners
- Lambert Engineering

Information must be used only for legitimate business purposes.

We expect all employees and business partners to:

- Protect confidential information.
- Respect intellectual property rights.
- Comply with UK GDPR and applicable data protection laws.
- Maintain cybersecurity standards.
- Prevent unauthorised access to information.

Confidentiality obligations continue after employment or business relationships end.

Further information can be found within our Privacy Policy located on our website.

Fair Competition and Responsible Business Conduct

We compete fairly and ethically.

We do not engage in:

- Anti-competitive behaviour
- Fraudulent conduct
- Misrepresentation

We conduct business with integrity and transparency.

Speaking Up

We encourage employees and business partners to raise concerns where they believe unethical, unsafe or unlawful conduct may be occurring.

Concerns may include:

- Bribery or corruption
- Fraud
- Modern slavery
- Sexual Harassment
- Harassment or discrimination
- Health and safety breaches
- Environmental violations
- Data protection concerns
- Any breach of this Code

Reports will be treated seriously, investigated appropriately and handled confidentially wherever possible.

Retaliation against anyone who raises a genuine concern in good faith will not be tolerated.

If you wish to make a report – please see below on reporting concerns.

Working With Suppliers and Business Partners

We seek to work with organisations that share our commitment to:

- Integrity
- Ethical conduct
- Human rights
- Health and safety
- Environmental responsibility
- Legal compliance

Suppliers and partners may be required to demonstrate compliance with these standards.

Failure to meet these expectations may result in review or termination of contractual relationships.

Compliance and Accountability

Everyone covered by this Code is responsible for understanding and adhering to its principles.

Breaches of this Code may result in:

- Disciplinary action
 - Removal from site
 - Termination of employment
 - Contract termination
 - Referral to relevant authorities where appropriate
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Reporting Concerns

If you become aware of any conduct that may violate this Code of Ethics, applicable law, or our expected standards of business conduct, we encourage you to report it.

Concerns can be raised:

- **Anonymously or confidentially** through the **Whistleblowing Reporting Portal** available on our website.
- **Directly to Lambert Engineering** by emailing Lambert.Speakup@lambert-automation.com

Reports will be reviewed appropriately and handled as confidentially as possible. We encourage anyone with a genuine concern to speak up promptly so that issues can be investigated and addressed.

Review

This Code will be reviewed periodically to ensure continued alignment with legal requirements, industry best practice and the values of Lambert Engineering.

Closing Statement

Lambert Engineering is committed to conducting business with integrity, excellence, respect and trust. We expect the same commitment from those who work with us and on our behalf, helping us build strong, sustainable and ethical relationships with our employees, customers, suppliers and communities.

