

Straker Translations Limited

Code of Conduct

This Code of Conduct (**Code**) sets out the ground rules for the way we work at Straker Translations Limited (**Straker**). We place great importance on honesty, integrity, quality, and trust, and we are all expected to adhere to the behavioural standards set out in this Code whenever we are identified as representatives of Straker.

While this Code does not contain a comprehensive list of acceptable ethical behaviour, it will help us to make decisions in our day to day work - whoever we are, whatever we do and wherever we do it. These standards are driven by our internal values.

OUR KEY PRINCIPLES

Each of us is responsible for our own behaviour and we all need to take accountability for the choices we make. In making informed choices, we must have regard to Straker's key principles:

- We value our reputation
- We are professional
- We keep our workplace safe and sound
- We steer clear of conflicts of interest
- We respect confidentiality and privacy
- We act morally
- We are not law-breakers
- We are good corporate citizens
- We respect this Code
- We are a team
- We respect the environment

1. We value our reputation

We have a great reputation in the market, and we want to keep it. Each of us has the ability to maintain and build that reputation. To do that, we always undertake our duties with care and diligence, and we deal fairly and honestly with each other, and with Straker's customers, suppliers, competitors and any other third parties.

2. We are professional

Straker's shareholders, customers and the community expect everyone who works at Straker to act professionally and ethically. We always strive to meet these expectations and to support others to do the same. We do not tolerate dishonest behaviour by anyone we deal with, and we always act with integrity.

3. We keep our workplace safe and sound

We foster a safe working environment that is inclusive and promotes wellbeing. We treat everyone we deal with at work with dignity and respect. We are familiar with and comply with all of our employment policies, which can be found on our intranet. Inappropriate behaviour, including harassment, discrimination, bullying and intimidation, will not be tolerated in any circumstances.

Discrimination or harassment based on race, colour, religion, gender, age, marital status, disability or other factors unrelated to legitimate business interests, will not be tolerated.

- We are all entitled to our personal preferences in private or political matters.
- No pressure should be placed on anyone to influence those preferences and no approval or disapproval of anybody's private or political preferences or activities should be shown by anyone in their role at Straker.

Employment and advancement decisions within Straker will be based upon merit, qualifications and competence and will not be issued or affected by unlawful discrimination on grounds of gender, age, marital status, sexuality, parental status, pregnancy, physical features, disability or impairment, ethnic origin or religious, political or other beliefs.

4. We steer clear of conflicts of interest

We make sure our individual interests do not interfere with Straker's interests, and we immediately disclose to our managers any business or personal relationships we have which might impact, or appear to impact, Straker's decision making processes. The perception of a conflict of interest can do as much damage to Straker's reputation as an actual conflict of interest, so we always keep an arm's length relationship when dealing with customers, suppliers or partners.

5. We respect confidentiality and privacy

In our work at Straker, we are entrusted with private and confidential information relating to Straker, colleagues, customers, suppliers, and other third parties. We respect the sensitive nature of this

information, and understand that misuse of this information could have severe consequences for those whose information is misused. We protect all private and confidential information entrusted to Straker, and we never misuse it. We act in accordance with Straker's Privacy Policy at all times.

6. We act morally

We aren't interested in any improper payments, benefits or gains of any kind. We don't do anything which might suggest that we are giving preferential treatment to a person or company that is offering a reward or gift. We only entertain customers and business associates in a manner approved by management, which includes avoiding any actual or perceived conflicts of interest.

7. We are not law-breakers

As a global business, Straker is subject to laws and regulations in all the locations in which we operate. We stay up to date and comply with all applicable laws, and otherwise act honestly and in good faith at all times. We respect the customs and business practices of the countries in which we operate while not compromising the principles embodied in this Code.

8. We are good corporate citizens

We care about our customers, our shareholders and our staff. We always meet our responsibilities to the financial community, and we make meaningful contributions to the wider community whenever we can.

9. We respect and use Straker assets for proper purposes

Straker assets, including goods, money, intellectual property or the services of other Straker employees and contractors, must not be used for personal gain. This includes, but is not limited to:

- improper use of Straker's company information;
- transcription of computer software programs regardless of whether or not the programs are protected by copyright;
- falsification or improper use of corporate cards, expense accounts or other similar accounts;
- unauthorised use of the Straker logo/trademark.

Straker's property is not to be removed from Straker's premises without authorisation. Every employee while in control of any Straker assets, particularly cash or other valuables, is personally responsible for them.

10. We respect this Code

Each of us has a responsibility to abide by this Code and its principles, and to report any conduct that may be in breach of the law, this Code or any other Straker policies. This means we are always conscious of what others around us are doing, and we honestly report all actual and suspected breaches to management or human resources. Anyone who breaches this Code may face disciplinary action including termination of their employment or engagement with Straker. However, no action will be taken against a person reporting a suspected breach in good faith.

11. We are a team

We're always innovating and growing, but we never forget that we're in business together. We work hard, and we celebrate our successes as a team.

12. We respect the environment

We are all responsible for maintaining and protecting the environment. We should, therefore, always consider the impact of our activities on the environment and the local community, including the way in which waste is disposed, chemicals are used and stored, and natural resources utilised.