



CODE OF CONDUCT

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1. Message from the Group Managing Director

At Finlays we have a long and proud history. The experience gained and lessons learnt over nearly three centuries feel more relevant today than ever.

We continue to draw on these lessons and our heritage to create a strong, ethical, and sustainable business. This means harnessing new technologies in a responsible way – using future innovations to deliver healthy products to the world. It means continuing the tradition of fair dealing that has helped us build life-long relationships and thriving communities. It means using over a century of experience to help make crops more sustainable and our supply chains transparent. Most of all, it means empowering our customers, large and small, to develop the natural, traceable, and trusted products that bring joy to their consumers with every sip.

Our reputation for being an honest, fair, and reliable company with which to do business is one of our most valuable assets, and we must preserve this at all costs. Maintaining high ethical standards within our company and in our relations with customers, suppliers, authorities, and the public in general is vital to our continued success everywhere we operate.

For this reason, we have developed this Code of Conduct which sets out the principles that apply to all Finlays people everywhere and in every circumstance. It is important that its content is well known and understood by each of us, as it highlights our responsibility, as a Group and as individuals, to implement and protect our Values and our ethical standards in the way we do business.

This Code and our Values serve to guide our behaviour every day and everywhere, ensuring that Finlays maintains its longstanding reputation as a trusted and reliable company and business partner to all of our stakeholders.

James Woodrow
Group Managing Director



“Our reputation for being an honest, fair and reliable company with which to do business is one of our most valuable assets, which we must preserve.”



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2. Our Values



ACTING FOR THE LONG-TERM

We do the right thing today for a better tomorrow

That means we're always asking

- Is this safe?
- Is this legal?
- Is it the right thing for people and the planet?
- Will this make Finlays and our partners stronger for the future?



TAKING ACCOUNTABILITY

We take ownership of our words, actions and results

That means we're always asking

- What is needed to get the job done?
- What will this deliver for colleagues, customers and partners?
- Are we holding each other accountable for our actions?



DOING BETTER EACH TIME

We challenge ourselves to build a stronger Finlays

That means we're always asking

- Is there a better way to do this task?
- Are we delighting our customers and stakeholders?
- Are we being ambitious enough in our goal?



SUCCEEDING TOGETHER

We collaborate to deliver excellence valuing each other's contributions

That means we're always asking

- Are we bringing the right Finlays' expertise to what we are doing?
- Are we encouraging and supporting each other to succeed?
- Are we respecting and recognising everyone's contributions

Introducing the Code



3. Background

Finlays has been in existence for nearly 300 years during which time its commercial success has been achieved through acting responsibly and by maintaining a reputation for fair dealing and integrity. We believe our reputation to be one of our most valued and valuable assets and it is vital to preserve it.

To help us do business the right way we have developed this Code of Conduct which sets out the principles based on our Values to clearly define the standards of behaviour we continue to expect from ourselves and those who work with us.

4. Code of Conduct

Our Code helps us make the right decisions. This is important because a single poor decision can have far-reaching consequences both for Finlays and for you. The Code cannot cover every situation, but it provides guidance and will point us in the right direction when we may need more help. You can find more details on the areas covered in our Code by reaching out to your point of contact at Finlays or contacting our compliance team at compliance@finlays.net

4.1 Who is covered under the Code?

It does not matter where you work or what you do for Finlays, you have a responsibility to behave in accordance with our Code, from part-time or full-time employees at every level through to our Board Directors. The Code also applies to every wholly owned subsidiary and joint ventures in which we have a majority interest.

Anyone who works on Finlay's behalf, including suppliers, agents, distributors, contractors, and consultants, must follow the principles in our Code whenever they are working for us or on our behalf and specifically must comply with our Sustainable Sourcing Policy as a condition to doing business with us.

4.2 What does the Code mean for me?

Following our Code means obeying the law, complying with all relevant policies and procedures, acting with integrity, showing respect for, building trust with each other and our business partners, holding yourself and others accountable and raising concerns if we believe something isn't right, please use our [helpline](#) to report anything to our Compliance or HR team. Each one of us is responsible for behaving with integrity and upholding the Company's reputation and this is why we should be familiar with the contents.

4.3 What do you need to do?

Finlay's expects you to know and do the following:

1. Know and live the Code of Conduct and uphold our Values.
2. Think before you act especially where things may be 'grey' or unclear.
3. Understand and comply with international and local laws and regulations that apply to your job and our business.
4. Ask for help if you are unsure or need guidance.
5. Be aware and pay attention to any activity that may be in breach of our Code of Conduct or Values.
6. Speak up – do not ignore any breach of our Code of Conduct, report any concern you have immediately to either your direct manager or to the Compliance Team.

4.4 What part do leaders and managers play?

Behaving with integrity starts at the top. Managers must set a good example, promote the Code to their teams and create a culture that encourages them to speak up and protect those who raise concerns. As a manager you should always escalate any breaches of the Code to the Compliance Team rather than dealing with them on your own.

5. Violation of this Code

Unethical behaviour, including intentional violation of the quality and food safety of our products, and breaches of the Code can have serious consequences. For the Company or its business partners it could mean lengthy and expensive investigations, large fines, criminal sanctions, and disbarment from government tenders. For individuals it could result in disciplinary or legal action and in some cases imprisonment. Any breach of our Code is capable of causing significant reputational damage to our business.





6. How to Make Good Decisions

Our Code of Conduct is not just about ‘doing things right,’ it’s about ‘doing the right thing’. If the right thing to do is not clear, ask yourself:

-  Is it consistent with our Code?
-  Is it legal?
-  Does it follow our policies and procedures?
-  Does it benefit Finlays or a customer as a whole – not just a certain individual or group?
-  Would I be comfortable if everyone knew how I had acted?

If the answer to any of these questions is **NO** or maybe or even if all the answers are YES but you still have doubts, you should get advice and ask questions. Contact the Compliance Team for guidance.

7. Health and Safety

Always safe

*Everybody, everywhere, every day,
in everything we do, at work and
at home.*

Finlays is committed to ensuring its facilities, operations, work environments and services are safe and healthy for its workforce and anyone else who may be affected by its undertakings, and to continually progress its aspiration of achieving zero harm.

GUIDANCE – 10 Life Saving Rules

If everyone applies the following 10 Life Saving Rules, they will not only minimise the risk of serious harm to themselves but also help create a safe working environment for all friends, colleagues, visitors etc., so helping to ensure that everyone goes home to their family and friends as healthy as when they came to work – every day, everywhere.

- 1. Compliance** – I will also comply with all health and safety policies, standard, procedures and site rules. If I don't know or understand anything, or if I think a rule or procedure is unworkable, I will tell my line manager.
- 2. Competence** – I will only carry out tasks/work that I have the necessary skills, experience and/or training for, or am being trained for with suitable supervision, where I understand the risks and relevant controls. If I do not feel competent, or feel unsafe, I will tell my line manager.
- 3. Working at Height** – I will assess all working at height before I start and will not proceed unless I feel safe to do so. I will not work at heights >2m unless authorized to do so, and there is a formal safe working procedure and/or permit to work.
- 4. Machinery Guarding** – I will always check guarding is in place before operating/working close to machinery and will identify emergency stop/cut off switches. I will never bypass or in any way interfere with any guarding. I will never attempt to clean any machinery, clear obstructions, repair faults, or carry out maintenance, unless authorized to do so and there is a suitable procedure in place.
- 5. Isolation** – I will always ensure all potentially dangerous energy is isolated (switched off) and/or locked out and tested before carrying out any cleaning, maintenance, adjustment, or repair work on any machinery, whether in the factory or field, and that such work is authorized.
- 6. Electricity** – I will carry out a visual inspection of any portable electrical equipment before I use it and will report any defects. I will never work on any high voltage systems or live electricity without an authorized permit for work.
- 7. Confined Spaces** – I will never enter a confined space unless trained and authorized to do so and with a formal permit to work that includes relevant air quality monitoring, suitable communication, and a means of emergency rescue in the event something goes wrong.
- 8. Vehicle Safety** – I will always comply with all relevant traffic rules and regulations, whether on site or roads. I will not drive/ride under the influence of drinks or drugs, I will not speed or use a mobile phone when driving. I will always wear my seatbelt/crash helmet and take a break if tired.
- 9. Personal Protective Equipment (PPE)** – I will always wear all PPE relevant to the task/work I'm doing and/or the place I'm visiting. I will look after my PPE and immediately report any loss, damage, problems etc.
- 10. Always Safe** – I will never walk past an unsafe act or condition. If I can make it safe will. If I can't – I will report it. If I see unsafe behaviour I will talk to the individual(s) concerned and have a safety conversation to help protect them. I will keep my own workplace clean, tidy and safe - always.

Please refer to our Health and Safety Policy on our website for further guidance.



8. Food Safety, Quality and Traceability

Our mission is to be the preferred supplier of tea, coffee, and botanical ingredients and solutions to many of the world’s best-loved beverage brands. We aim to be a trusted supplier to all of our customers worldwide. All of us have a responsibility to do what we can to ensure that our products meet applicable regulations and are of the quality expected by our customers. We commit to providing food safe and consistent quality products always. We have standard operating practices and Quality and Food Safety policies and programs in place, which we all shall adhere to.

Guidance

1. At a minimum we comply with all applicable laws and food safety standards both where we manufacture and where we supply. You should be aware of these laws and standards where they are relevant to the role you perform. These can be found in each Business Unit Legal Register.
2. We understand what our customers need and expect and manage this with clear and open communication.
3. We react in a timely and effective way to customers’ questions or concerns.
4. Develop strong and transparent relationships with those suppliers and other business partners whose own products and services meet our standards.
5. We comply always with the quality standards set out for our products and their manufacture and packaging.
6. We ensure full traceability in our processes and within our supply chain.

Q&A

Q: A customer contacts you to say that he believes our product is contaminated. What should you do?

A: Do not try to investigate this yourself but let the customer know that you plan to escalate the issue immediately. Report the issue immediately to your Quality or Technical Manager, who will follow the necessary Crisis Management process, alerting the Global head of Quality Assurance or a member of their team who will deal promptly with the customer.

Q: You have been instructed by your supervisor to ignore an important quality check, or result. You know this is not right. What should you do?

A: You can discuss this with your manager and indicate that this doesn't feel right, and you believe that it is important to act differently on this for our customers. If you don't feel that you can do this, you can escalate this with your site to your Quality Manager, or you can contact Group Quality through the See Hear Speak up hot line, or directly on email/telephone.

Q: You, or a member of family or friend have purchased one of our products from the trade. You see that the product is defective (faulty packaging or doesn’t taste/look right). What should you do?

A: You should immediately log this as a consumer complaint at work, following your complaints procedure. This will automatically be logged in a system that allows investigation and enables the team to identify trends.





9. Workplace and Human Rights

Finlays is committed to being a business where people are valued and treated fairly encouraging growth and development. We respect the human and labour rights of Finlays employees and all those whose lives may be impacted by our business activity, wherever we do business in the world.

We respect those rights established in the International Bill of Human Rights, and the International Labour Organization (ILO) Declaration on the Fundamental Principles and Rights at Work. We also take guidance from the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination Against Women, and the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.

Our approach to respecting human rights is based on the UNGPs, the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the Ethical Trading Initiative Base Code. We will always uphold the national laws in the countries where we do business.

GUIDANCE

1. We recognise the right to a safe and healthy working environment as a fundamental right for every worker.
2. We are committed to providing decent working conditions for all our employees. We will not tolerate any forced labour, modern slavery or human trafficking. All employment must be freely chosen, and free from debt bondage.
3. We treat all employees and business partners with respect. We will make decisions on hiring, pay, benefits and promotion entirely on merit.
4. We are committed to maintaining a workplace built on trust, honesty, fair treatment, and respect for individual rights.
5. We will not tolerate harassment, bullying, discrimination, or harsh or inhumane treatment of any kind.
6. We offer pay and benefits at equal to or exceeding the relevant legal minimum of the countries in which we do business.
7. Working hours must not be excessive and overtime must be voluntary. Our working hours comply with relevant national and local regulations.

8. Child labour must not be used. We are committed to upholding the rights established in ILO Convention 138 relating to the minimum working age, and Convention 182 relating to the worst forms of child labour.
9. We respect employees' rights of freedom of association and collective bargaining and the right to participate in other groups (either formally or informally) to promote and defend common interests.
10. We are committed to fostering a speak-up culture; providing accessible channels for grievances to be raised in confidence, without fear of retaliation. All Business Units have grievance contact points at the local level. An independent confidential reporting service provided by See Hear Speak Up is also available to employees, contractors, suppliers, and wider rightsholders alike.
11. If we know of any breaches of these principles we will take action. If you know of any breaches of these principles, please report to your line manager following the whistleblowing/Grievance Policy.

Q&A

Q: You suspect that one of our suppliers may have some underage workers at their site and we have only just signed a new contract with them. What should you do?

A: Submit a Supplier non-conformance, report this to your manager, the Speak Up helpline or the Director of Corporate Affairs. They will decide on what to do next. If you are an external third party, please use the SeeHearSpeakUp helpline. Report this to your manager, the Speak Up helpline or the Director of Corporate Affairs. They will decide on what to do next.

Q: One of the senior managers at my business unit is very rude and aggressive to members of his team and other colleagues. Everyone feels scared to engage him in conversation or ask for guidance regarding our day to day jobs.

A: If you feel able you should try to explain to the manager that his/her behaviour upsets his/her colleagues and stops them from asking for help or guidance which it is his/her job to provide. If this is too difficult you should report this behaviour to HR. Finlays expects all colleagues to treat one another with respect.

Q: As a local estate manager, I have a number of family members reporting into me in various subordinate roles. Is this ok?

A: In small village locations it is always likely that this sort of situation will occur. You should disclose the family relationship and excuse yourself from any HR related decisions about family members, including recruitment.

10. Bribery and Corruption

We believe that conducting business with integrity is critical to the continuing development of Finlays as a successful, sustainable, and trusted business partner. Corruption hinders economic, social, political development and progress. Consequently, we do not tolerate any form of bribery or corruption by our employees or business partners. We never offer, give, or accept bribes in order to gain a business or other advantage.

Guidance

1. Bribery means giving or receiving anything of value either directly or through an intermediary in order to gain improper advantage or influence.
2. Bribery can take many forms – not just cash. Gifts, travel, entertainment, offers of jobs or internships, charitable donations, or anything else that has value to the recipient could be a bribe.
3. There are anti-bribery laws in most countries and some of these give their governments the ability to pursue wrongdoers beyond national boundaries. For this reason, we must ensure we comply with ALL laws and regulations that prohibit bribery wherever we are doing business and do all that we can to ensure that we only work with business partners who do the same.
4. Always report any offer or demand of a bribe, however small, to the Compliance Team, an appropriate senior manager, and the Director of Corporate Affairs.
5. Facilitation payments (small payments to obtain a particular service which should be automatically provided) must not be made. The only exception to this rule is any situation where you or anyone connected with Finlays is or feels threatened or in danger. These situations should be report to the Compliance Team and the Director of Corporate Affairs.

Q&A

Q: A customs broker says he can speed up processing times for our goods if we pay a special handling fee. Can we do this?

A: Not without carefully reviewing what service we are paying for. Any such request must be referred to the Director of Corporate Affairs for approval. Please use the Compliance APP for those requests.

Q: A port official whose job is to inspect and approve cargos of goods asks us to pay \$10 for every form he fills out. What should we do?

A: This is very likely what is known as a facilitation payment and must not be paid. Any requests for such payment should be reported to the Director of Corporate Affairs or via the helpline.

Q: We want to break into a new market and having done some research we are told that there is only one possible agent who can do this for us. Can we go ahead and appoint them?

A: This may be fine, but you must do proper due diligence to ensure that we will be working with a business partner who will adhere to our Values and comply with our Code. You should speak to the Director of Corporate Affairs before entering into any agreement.

Q: One of our employees has been arrested following a road traffic accident. We went to the police station to get them released but the police sergeant said we would have to pay him a sum of money for his release. This was not in the form of a bail payment, it had to be in cash and there would be no receipt. Should we do this?

A:You should immediately contact the Director of Corporate Affairs who will advise on the correct action to be taken.





11. Gifts and Hospitality

Receiving or giving gifts of appreciation of modest value or accepting or providing reasonable hospitality can build on and enhance a business relationship. However, any gift or hospitality however modest and innocent can give rise to a perception of undue influence or unfairness. Each of us must exercise good judgement, common sense and moderation when deciding what is acceptable and what is not.

Guidance

1. Accepting or offering any gift or hospitality that makes the recipient feel obliged to act in a certain way or appear to do so, is unacceptable and in breach of our Code.
2. Gifts/hospitality may be offered or accepted in the normal course of doing your job provided it is reasonable and modest and does not influence or appear to influence your or another's actions or decisions.
3. Gifts/hospitality must not be given or received in breach of local laws or regulations including an internal policy or code of conduct applying to a customer or supplier.
4. Gifts/hospitality may not be offered to government or public officials without first receiving guidance from the Director of Corporate Affairs.
5. All expenses must be properly recorded in reasonable detail so that they accurately reflect the true nature and amount of the expense and can be related directly to a business purpose.

Q&A

Q:A potential new supplier invites me out for a meal, but we are in the middle of the tender process. What should I do?

A:Politely decline explaining that it would not be appropriate during the tender.

Q:I would like to take a long-standing customer to a football match. We would be going together. Is this OK?

A: This is acceptable in most circumstances provided that you attend with them as part of maintaining a good business relationship. Be careful of corporate packages which may end up costing an unreasonable amount in the context of the relationship. If in doubt, ask.

12. Conflicts of Interest

Conflicts of interest typically occur when the private activities of employees or immediate members of their families clash with the business interests of the Company or when family members work in different roles within the same business unit. In such cases we may find it difficult to take objective business decisions and sometimes a conflict of interest can cast doubt on our own integrity.

Guidance

- 1. Business dealings with relatives, outside employment or activities, investments, and private arrangements with any of the Company's business partners may become sources of conflicts of interest.
- 2. Potential conflicts of interest should be avoided, or if unavoidable, dealt with in an open and transparent manner.
- 3. If you become aware of an actual or potential conflict of interest report it to the Compliance Team.
- 4. If it is decided that there is an actual conflict you will need to excuse yourself from any decisions until the conflict has been resolved or in some cases you may need to withdraw from a particular transaction completely.
- 5. We will keep written records of all reported conflicts of interest.
- 6. Each year you will be asked to confirm that you are not aware of any actual or potential conflict of interest or report those that you are aware of.

Q&A

Q: My business unit is looking for a new facilities manager and my brother owns a successful facilities management company. Can I recommend him?

A: Yes, but you must disclose the relationship and not take part in any decision-making process.

Q: I have been invited to invest in a small private company that provides services to Finlays. May I invest?

A: Yes, but you must disclose the matter and remove yourself from any dealings that company may have with Finlays whilst you are an employee. Further any involvement must be undertaken in your spare time.

Q: As a local estate manager, I have a number of family members reporting into me in various subordinate roles. Is this ok?

A: In small village locations it is always likely that this sort of situation will occur. You should disclose the family relationship and excuse yourself from any HR related decisions about family members.





13. Confidentiality and Privacy

Confidential information is a valuable asset and often critical to our commercial success and that of our business partners and we must all help protect and manage it effectively. We are committed to protecting the confidentiality and privacy of both our own information and that belonging to those we work with. We comply with all applicable laws and regulations protecting confidential information, including laws relating to personal data and privacy.

GUIDANCE

1. Examples of confidential information include trade secrets and know-how; unpublished financial results; business ideas, processes, plans or proposals; production information; marketing or sales forecast; customer information; pricing; employee data; potential Joint Venture or Merger & Acquisition activity.
2. Only share confidential information with those colleagues who have a legitimate business need to know.
3. Do not share confidential information with anyone outside the Group unless you have internal authorisation to do so, and you have put in place a confidentiality agreement. Please refer to the Compliance Page to find a copy of the template. Only employees who have Delegation of authority can sign any documents on behalf of the company. In case you don't have it, please refer to the Delegation of Authority from your Business Unit.
4. Make sure you do not leave confidential information including on a laptop where others may find it.
5. Avoid discussing confidential information in a public area where you may be overheard, or data accidentally disclosed.
6. Take care when travelling on business to safeguard your laptop and phone.
7. Ensure that employee data is shared on a strict need to know basis and that appropriate safeguards are put in place prior to any necessary transfer such as anonymisation and/or password protection
8. Be aware of the privacy laws which may apply to you when carrying out your job in particular when making use of, processing or transferring HR, customer, or supplier data.

Q&A

Q:I have recently employed a sales manager from a competitor, and I am aware that she will have information about her former employer's business that I could use to help Finlays. Can I do this?

A:No. This is confidential information belonging to her old employer and must not be used in any circumstances.

Q:My line manager travels a lot and is very busy. She calls me and asks me to log into the company system using her ID and password to retrieve some confidential reports that I would not otherwise have access to. Can I do this for her?

A:No. You must not share passwords and only those employees authorised to access confidential information can do so.

Q:You receive an email from a colleague which contains information you are expecting but attaches a spreadsheet listing colleagues names and performance reviews. What should you do?

A:This is a potential data breach, and you should report it immediately to the Director of Corporate Affairs. You should delete the attached spreadsheet and let the sender know what has happened.

14. Fair Competition

We are committed to lawful and free competition and to competing rigorously only on the merits of our products. We abide by all applicable competition laws in all the countries in which we operate. We do not engage in any kind of behaviour with competitors that might restrict fair competition or distort the market.

Guidance

- 1. Any employee or business partner engaged in selling our products must understand the competition rules in the countries where they work.
- 2. Treat all customers in a straightforward manner that ensures their independence and delivers the best product and service levels to meet their needs.
- 3. Do not interfere with distributors' freedom to set their own resale prices.
- 4. Compete on the merits of our products, ensure that all marketing and other communications accurately and fairly describe them.
- 5. Do not engage in any contact whatsoever with competitors where price, markets, sectors, contracts, capacity, productions, or any customer information is discussed.
- 6. Ensure that meetings with competitors are for a lawful purpose for example trade association meetings, regulatory or compliance discussions and that any such meeting has been pre-approved by the Director of Corporate Affairs.

Q&A

Q: Whilst attending a trade association dinner an employee of one of Finlays competitors approaches me to discuss 'market strategy'. What should I do?

A: Tell the employee that this matter cannot be discussed and remove yourself from the situation. Report the incident to the Director to Corporate Affairs using the Compliance APP.

Q: In an annual review of performance, I am discussing a distributor's plans for the market the following year. Can I tell him what prices he must sell at?

A: No. Our distributors buy from us at a price we agree. They then sell on to their own customers at their own prices. We must not attempt to dictate or influence these prices.



15. Environment and Social Impact

We are committed to protecting the environment and the people who work within our business. Our environmental policy sets out our approach to managing these risks and opportunities across our operations and supply chain. We will play an active role in managing our footprint sustainably and work with suppliers, communities, and the beverage industry to do so.

Guidance

- 1. We are all responsible for ensuring the highest environmental standards are upheld across all Finlay's operations and supply chain.
- 2. We will collaborate with suppliers, customers, government, NGO's, unions, and other stakeholders to protect the climate and the environment
- 3. We commit to protecting people across our supply chain by upholding human rights in line with the Ethical Trading Initiative (ETI) Base Code and the UN Guiding Principles.
- 4. We commit to adopting best practice in supplier and smallholder development through crop selection, sustainable farming techniques, production processes and environmental management.

Please refer to the [Environmental Policy](#) on our website for further guidance

Q&A

Q:A charity I support is asking local businesses for help. Can I ask Finlays or my team to do this?

A: This should be possible, provided that you follow the guidance provided in the Political Activity and Charitable Contributions Policy and that the charity is a properly registered and authorised charity. You should speak to the Group Head of Sustainability and the Group Director of Corporate Affairs before agreeing to do anything.

Q: A local business has offered to dispose of some of our waste at a much cheaper rate than we're currently paying our contractor, but I'm not sure how they then dispose of it. Should we take up this offer?

A: No, not unless you can confirm that the business is properly licensed and compliant with all relevant legislation, and that you have taken all reasonable steps to ensure that the waste is being properly disposed of.





16. Political Activity and Donations

As a global company we are part of many different political communities and wherever we operate politics plays an important role for both business and individuals. We therefore engage in external debate on subjects of legitimate concern for us, our employees, or our local communities in order to promote and safeguard their and our interests.

Guidance

- 1. We will engage in lobbying government and being represented on industry bodies that interact with government or regulators on issues that concern our business.
- 2. Lobbying is a highly regulated activity and only certain approved and authorised colleagues may undertake such activity.
- 3. We do not make any political donations, nor are we affiliated to any particular political party in any country in which we operate.
- 4. As an individual you have the right to take part in the political process in ways that are appropriate to the country in which you reside, and which do not conflict with your duties as an employee. You should always make it clear that your political views and actions are yours and not those of the Company.
- 5. Never hire a government official or lobbyist to perform services for the Company unless you have prior approval from the Managing Director of James Finlay Limited.

Q&A

Q: My brother-in-law is well connected in the local ruling political party and says that he can get us preferential treatment from the local government if we make a donation to fund the party's political activities. Shall I make this payment?

A: No, Finlay's policy is not to engage with any particular political party. There is also a risk that such a payment could be seen as a bribe.

Speak Up!



All of us must conduct ourselves in a way that supports both the spirit and letter of our Code. We take our legal, social, and ethical responsibilities seriously and recognise that breaches of our Code or supporting policies and procedures could significantly harm our people, business partners, our business, or our reputation.

Everyone has a responsibility to raise concerns about breaches or potential breaches of our Code, and we do not tolerate retaliation of any kind against anyone who raises a concern in good faith. You should speak to your line manager, a senior manager, or a member of the Speak Up Committee, a group of senior managers responsible for our internal process for reporting and investigation concerns. If you wish you can submit any concerns or questions to the Compliance Team via the Compliance APP.

However, if you would prefer not to do this you may report your concern either by telephone call or online report to [SeeHearSpeakUP](#). SeeHearSpeakUp is a specialist independent company which provides a confidential service available 24/7. SeeHearSpeakUp is staffed by professional investigators who speak a wide range of languages. They will listen to your concern and provide a written report to the Speak Up Committee for further investigation whilst protecting your anonymity if that is what you request.

SeeHearSpeakUp Numbers for relevant countries

UK	0800 056 2539
USA	1 855 290 6405
Kenya	0800 221 9030
Sri Lanka	07209 87119
Argentina	0800 2667499
Indonesia	001 803 011 3699
Dubai	8000 178 171
Malawi	0026 483 380 0109
China	400 120 2442





THANK YOU FOR READING

If you have any questions about our Code of Conduct or around a specific section of our Code, please reach out to your point of contact at Finlays and they will put you in contact with the right person.

If you have any other questions, please email
Compliance@Finlays.net

General Information

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