

Colson X-Cel Ethics Policy – QP 12

1. Purpose

To establish ethical principles and conduct standards for all employees, ensuring compliance with legal, regulatory, and organisational requirements.

2. Scope

Applies to all employees, contractors, and representatives of Colson X-Cel Ltd.

3. Ethics Policy

- Commitment to honesty, integrity, and fair business practices.
- Compliance with applicable laws and regulations.
- Respect for colleagues, customers, and stakeholders.

4. Code of Conduct

4.1 Core Principles

- Compliance: Adhere to all laws, regulations, and internal policies.
- Integrity: Avoid bribery, corruption, and conflicts of interest.
- Fair Competition: Conduct business transparently and ethically.
- Respect & Inclusion: Promote diversity, equality, and a harassment-free workplace.
- Confidentiality: Protect company and customer data.
- Environmental Responsibility: Support sustainability and minimise environmental impact.

4.2 Employee Responsibilities

- Act professionally and uphold company values.
- Report unethical behaviour promptly.

4.3 Reporting & Escalation

- Report concerns first to your direct manager.
- If the issue remains unresolved or if reporting to your manager is inappropriate, escalate using HORNGROUP's SpeakUp system: <https://indus.speakup.report/en-GB/Horn/home>.
- Confidentiality is guaranteed for whistleblowers.

Issued by: SHEQ Manager
Effective Date: 11/12/25
Approved by: Managing Director

