

V6	03/23	DW
Review Date		03/24

Business Ethics Policy

Swish is committed to conducting all of its business activities in an ethical manner; respecting our obligations under the law, supporting our employees in making ethical decisions in relation to how they discharge their duties and making constant improvements in our environmental performance.

This policy applies to Swish employees (staff, contract and temporary) and extends to all of our business dealings and transactions in all countries in which we operate.

We will encourage the adoption of this policy amongst our business partners including contractors, suppliers and customers.

Policy

Our Corporate Responsibility Policy sets out our commitment to operate responsibly and to engage with our stakeholders to manage the social, environmental and ethical impacts of both our activities and their's. Our environmental and social policies are set out in dedicated policies.

Anti-Corruption

Swish Building Products does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company.

Employees have strict guidelines regarding hospitality and gifts accepted or offered, which are subject to managerial review. Swish does not make direct or indirect contributions to political parties.

If any instance of bribery or corruption is identified, the company will take remedial steps immediately.

Training and communications

This policy and relevant guidance will be communicated to employees across the Company through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

Raising concerns and seeking guidance

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage.

Monitoring and review

The Swish Corporate Responsibility Committee will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

Internal controls and audit

Swish Building Products has established mechanisms to maintain accurate records, which are available for inspection and which properly and fairly document financial transactions and agreements. Internal control systems are subject to regular audits to provide assurance that they are effective in countering corrupt practices.

STUART HUDSON
Managing Director