

Policy

Code of Business Conduct

Classification: Public

While we are primarily focused on delivering value to our shareholders, this Code of Business Conduct takes into account the interests of all stakeholders that the Company's activities reach: namely, investors, employees, customers, suppliers, competitors and the wider community - as well as the environment shared by everyone.

Shareholders

The Company is responsible to those who provide funding. We:

- Provide financial reports that are accurate and timely.
- Seek to use financial resources entrusted to us in ways that maximise value over time and promote the long term interests of the Company.
- Communicate honestly to all concerned our policies, achievements, viability, risks and prospects.
- Work at all times to comply with the provisions of the Stock Exchange Listing Rules and aim to comply with corporate governance best practice.
- Safeguard shareholder funds against fraud, bribery or corruption.
- Respect and comply with all laws, regulations and codes within jurisdictions in which the Company operates.

Employees

The Company values its employees highly. We:

- Respect the dignity and rights of all employees.
- Encourage our employees to live by, and adhere to, the Company's six values.
- Provide healthy and safe work environments.
- Have a transparent remuneration policy that rewards the contribution of our people.
- Encourage employees to develop skills and progress their careers.
- Do not tolerate any sexual, physical or mental harassment of our employees.
- Do not discriminate on the grounds of worker status, colour, ethnic origin, gender, sexual orientation, age, disability or religion.
- Do not employ underage employees or forced labour.
- Take action to prevent acts of modern slavery and human trafficking from occurring within our businesses and their respective supply chains, seeking to impose these same high standards on our suppliers;
- Encourage employees to report any suspicions of fraud, bribery, corruption, tax evasion or undesirable practice, and we have introduced processes to facilitate this, including a whistleblowing telephone hotline and policy guidelines.
- Encourage employees to participate in Board and workforce engagement through both local, regional and national employee engagement forums and specialist Colleague Consultation Forums.
- Comply with rules of immigration and respect people's right to work.

Customers

The Company's customers are of paramount importance. We:

- Seek to be honest and fair in our dealings with our customers.

Smiths News

Rowan House, Cherry Orchard North, Kembrey Park, Swindon, SN2 8UH

+44 (0)345 125 5222 info@smithsnews.co.uk

smithsnews.co.uk

- Provide the quality and standard of service that customers have a right to expect.
- Provide and promote a range of products and services responsive to customer needs that provide value for money.
- Provide products and services that are safe, fit for purpose, meet legal standards and are never described in a misleading manner.
- Treat all customer complaints seriously and provide a readily accessible source of advice and guidance regarding our products and services.

Suppliers and Business Partners

The Company's relations with its suppliers are based on mutual trust and respect. We:

- Seek to be honest and fair in our relationships with suppliers.
- Pay suppliers in accordance with agreed terms.
- Respect any confidential information.
- Respect copyright and intellectual property rights.
- Have a policy not to offer, request, pay or accept bribes or similar/analogous favours and to avoid conflicts of interest.
- Encourage our suppliers and business partners not to engage in, or facilitate, tax evasion, and to report any concerns straightaway.
- Promote ethical global sourcing standards advocated by the International Labour Organisation in the Company's procurement activities, including the promotion of appropriate due diligence and action to tackle modern slavery;
- Encourage our suppliers and business partners to at least meet the same standards of business conduct as those outlined in this Code;
- Encourage strict compliance ensuring that no one trading with the Company in any manner whatsoever offers, promises, gives, accepts or receives a bribe or seeks to bribe a foreign public official.

Community and Environment

The Company seeks to be a good corporate citizen, respecting the laws of the countries in which we operate and contributing to the communities in which we operate. We:

- Aim to make the communities in which we work better places to live and do business.
- Seek to be sensitive to the local community's culture and social and economic needs.
- Encourage our employees to be involved with local communities to their mutual benefit.
- Aim to pay our share of taxes and not to participate, or facilitate others participating, in tax evasion.
- Measure and, where appropriate, seek to reduce and mitigate the environmental impacts of our business activities.
- We seek to optimise use of green / renewable energy resources and reduce our generation of waste.

Policy Administration & Control

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