

## ETHICAL POLICY STATEMENT

Our ethical policy has been established to set standards and provide guidelines regarding the way Alcema, Alcema Construction & Alcema Fire Safety Limited (Alcema Group) should operate in Ethical matters. It is important to retain this set of core values and approaches to the process of doing business on a daily basis.

The Ethical policy focuses around nine key areas as follows:

### Employees

Alcema Group values its Employees as a key resource. We believe that an atmosphere of good employee communication, involvement & responsibility both individually & as a team is of central importance. The personal development and optimum use of Employee talent is encouraged.

Every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people who demonstrate entrepreneurial behavior and show individual initiative in combination with a high degree of knowledge and experience of our products, markets and culture.

We are committed to promoting equality of opportunity and preventing discrimination in line with the Equality Act 2010. We ensure no employee or applicant is treated less favourably on the grounds of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

### Customers

Everybody must play their part in providing quality and efficiency to customers. Alcema Group believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers.

### Suppliers

Alcema Group believes in supporting UK trade and therefore will only buy from preferred UK based manufacturing companies if possible. Alcema Group will aim to develop relationships with suppliers based on mutual trust and all dealings will be conducted in a professional manner at all times. We also undertake to pay our suppliers on time and according to agreed terms. All supplier relationships are assessed against our Quality standards.

### Community

Alcema Group seek to comply with all legislation affecting its operations. We will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will take into account the concerns of the wider community including both national and local interests. In particular, we will agree a chosen local charity each year and endeavor to raise money outside of business interests for this Charity.

### The Environment

Alcema Group is concerned with the conservation of the environment in its broadest sense, and recognises that certain resources are finite and must be used responsibly. We will therefore: Work with others toward a consensus on environmental quality standards which are desirable and attainable. Aim to improve all aspects of the business in respect of environmental issues. Pay particular attention to environmental issues including the conservation of energy and natural resources, the control of noise levels, recycling of waste material and the utilisation of non-polluting technology. This is reflected in our emphasis to supply recycled promotional products as an option wherever possible

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## Health & Safety

Alcema Group provides safe working conditions for all its employees and will do all that is reasonable and practicable to:

- Protect the health and safety of its employees and minimise any adverse effects on the environment.
- Implement working practices to prevent personal injury and damage to property.
- Making all employees aware of risk assessments and raise awareness of their own responsibilities for the health and safety of themselves and others.

## Human Rights

Alcema Group is committed to the prevention of any violation of established Human Rights of any kind, particularly where child labour or undesirable forced acts are involved.

We do not employ anyone under the age of 16. For employees aged 16–17, we ensure compliance with Working Time Regulations, including restrictions on working hours and rest breaks.

We have a zero-tolerance approach to modern slavery and human trafficking. In line with the Modern Slavery Act 2015, we ensure that our operations and supply chains are free from slavery, servitude, forced or compulsory labour and human trafficking.

## RESTRICTIONS FOR YOUNG WORKERS OVER COMPULSORY SCHOOL LEAVERS AGE

There are restrictions that apply to the employment of young workers over compulsory school leaver's age, as follows:-

- You must not work for more than 8 hours a day;
- You must not work for more than 40 hours a week;
- You must not work for more than 4.5 hours in any day without a rest break of 30 minutes.
- You must have a rest period of not less than 48 hours in each seven day period.

## Social Responsibilities

Alcema Group is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their own businesses and supply chains throughout the world. It will conversely not invest in or do business with any organisation that:

- Manufactures or designs weapons, instruments of warfare or torture, or that derives significant revenue from weapons related products or services; or
- Manufactures tobacco products or derives significant revenue from tobacco related production.

## Conflict of Interest

This policy does not allow bribery or political contributions and requires employees to seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interests. This covers the receipt of giving of gifts or hospitality which is prohibited.

## Information

Alcema Group regards information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected.

We handle all personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This applies to employee, customer, and supplier data.

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This applies also to intellectual property including inventions, trade secrets, technical information, product design, production expertise, and customers’ information etc.

**Records**

Honesty, completeness and accuracy of records are vital. Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. No unrecorded funds or assets should be established or maintained.

**Integrity**

We demand of each other and ourselves the highest standards of individual and corporate integrity. We do the right thing, because it is the right thing to do. It is every employee’s responsibility to safeguard organisation assets and foster an environment of trust with our -workers, customers, communities and suppliers. We should always comply with all our organisation policies, meet legal requirements, and create an environment of transparency in which all reporting requirements are met.

**Excellence**

We routinely challenge ourselves to improve our products, services and processes. We strive always to understand our customers’ businesses and help them achieve their goals. We serve our customers by anticipating and responding to their needs. We are dedicated to diversity, fair treatment, mutual respect and trust. We are committed to producing products and serving our customers with zero harm to people and the environment.

**Teamwork**

We foster an environment that encourages innovation and creativity and delivers results through collaboration. We practice leadership that teaches, inspires and promotes full participation and career development. We encourage open and effective communication and interaction with all workers and stakeholders, actively working together to keep each other safe and in good health. We believe that none of us is as capable or effective as all of us – and together, there’s no limit to what we can achieve.

**Accountability**

We honour the commitments we make and take personal responsibility for all actions and results.

Our actions match our words, and we demand responsibility – from ourselves and others – in everything we do. We operating on the basis that continuous improvement is an integral part of our culture.

Regardless of our position within the organisation, we share equal accountability for:

- Conducting business with integrity, preserving our strong reputation and expanding our position in the marketplace.
- Fostering an inclusive culture in which we all feel respected and have the opportunity to reach our full potential.
- Providing a healthy and safe work environment and complying with applicable environmental laws and regulations wherever we operate around the world contributing to the sustainability of the communities in which we live and work.

Alcema Group believes that implementation of this ethics policy:

- Sets clear standards for employees.
- Makes good business sense.
- Protects integrity and enhances our reputation.
- Supports the principles of good corporate governance.

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## Whistleblowing

We encourage all employees and stakeholders to report concerns or suspected breaches of this policy through our Whistleblowing Policy. Reports can be made confidentially and without fear of retaliation.

Signed

Jason Spencer, MD, Alcema, Alcema Construction & Alcema Fire Safety Limited

Review Date: 16/08/2025

Next Review: 15/08/2026

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