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Introduction and Objectives

The Nationwide Hygiene Group is committed to conducting its business through the application of ethical, professional and legitimate standards. Adherence to applicable laws and regulations and the application of basic standards of behaviour expected in society, point the way for each of Nationwide Hygiene Group's employees to determining the correct course of action to take in their daily working lives.

The standards of business for the Group provide employees with guidance on their personal conduct. It is the aim that neither the Group's overall integrity nor its local reputation would be damaged if full details of any business practice or transactions were to be publicly disclosed.

Scope of Application

The Group will take account of this policy throughout the organisation including within:

- Policies & procedures
- Administration of the supply of products from suppliers
- Distribution of hygiene products
- Management of the Group's Chesterfield facilities

Every employee, director and officer of the Group is expected to comply with these standards and to behave in a mature, professional and responsible manner.

Related Policies

Added Value Opportunities Animal Welfare Policy Anti-Bribery & Corruption Policy Corporate Social Responsibility Policy Complaints Procedure Delivery Policy Disaster Recovery Plan Environmental Policy Ethical and Environmental Procurement Policy Equal Opportunities Policy Health and Safety Policy Personnel Screening & Vetting Policy Supply Chain Policy Sustainability Policy

Not Controlled if Printed The Company reserves the right to amend, change or withdraw any part of this document at any time.

Nationwide Hygiene Supplies

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Policy Guidelines

General Principles

The Group expects all employees at all levels to commit to working within core guidelines which include:

- Obeying the law
- Clear and transparent operational processes
- Applying themselves to their role to the best of their ability
- Straightforward and honest co-operation with colleagues, suppliers, customers and other stakeholders
- Openness, fairness and consideration
- Careful storage of confidential information and company property
- Compliance with all company policies

Conflicts of Interest

All employees should avoid situations where personal interests could conflict, or appear to conflict, with the interests of the Nationwide Group. Each employee must ensure that his/her conduct does not provide, or give the appearance of providing, him/her with personal gain (or that of the employees relations/circle of friends) at the expense of the Group or external business contact. It is the responsibility of all employees to openly disclose both such a conflict and/or the possibility of such a conflict of interest arising, to their line manager.

Making or receiving of illegal payments or inducements, such as bribes, are contrary to this policy and the funds and resources of the Group shall not be used directly or indirectly for any such purpose.

It is the Group's policy not to make any donations to political parties.

Compliance With Laws, Rules and Regulations

The Group and its employees must observe the laws, rules and regulations of each country in which they operate. If there is any doubt, guidance should be sought from the line manager who will decide whether to obtain specific legal advice.

Protection of Confidential Information

No employee shall without proper authority access, modify, disclose or make use of any trade secrets, confidential commercial Group or personal information for any purpose other than legitimately carrying out his/her duties. The obligation of confidentiality extends after employees cease working for the Group and covers disclosure to others.

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Protection and Proper use of Company Assets

Each employee is responsible for the protection and appropriate use of the Group's assets. This includes being responsible for the establishment of, and adherence to, procedures that ensure that the Group's assets are not put in jeopardy or used wastefully. Whether it is responsibility for efficient plant and office maintenance, energy conservation, security, protection of information or effective control procedures (including personal expenses), every employee must seek to use all the Group's resources with efficiency, honesty and the highest standards of care.

All employees are prohibited from taking advantage for themselves of any business opportunities that arise through the use of corporate property, information or position. This includes obtaining personal gain or competing with the Group.

Relationships with Customers and Suppliers

Each employee has the responsibility to ensure there are no compromises in delivering the highest standard of services and products and that every aspect of the Group's operations which impacts upon quality promotes and reflects these standards. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of material facts.

The giving and receiving of gifts, entertainment and gratuities between employees and suppliers or other outside business acquaintances represents a source of potential conflict of interest. Any gift likely to be deemed as influential upon decision making is unacceptable.

The Group's Employees

Employees should treat each other with respect, courtesy and decency. Disparagement, harassment or negative comments regarding fellow employees or business contacts are inconsistent with these standards and every employee should refrain from, and should discourage, such behaviour.

Each employee is to ensure that his/her conduct does not place their personal safety or the safety of others in jeopardy. This requires an active participation in maintaining a safe working environment and includes observance of established safety procedures and making recommendations for changes where they are needed.

In all circumstances, including when travelling on Group business, each employee is to conduct himself/herself in a professional, mature and responsible manner at all times.

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Compliance and Reporting

All employees are expected to comply with the Group standards of business conduct as detailed herein. Failure to do so will result in disciplinary action being taken which, in the case of serious breaches, could lead to dismissal.

The Group must be made aware of failure to adhere to the above standards, including any issues relating to accounting, internal controls and auditing matters. The details of any concern can be reported on a confidential or anonymous basis and should be reported honestly, accurately and without malice.

If any matter is not dealt with in a manner the employee feels is appropriate, or it is not possible to discuss the matter with the line manager for any reason, the matter should be reported to the Chief Executive. If the matter relates to the Chief Executive or another main Board Director, it should also be reported to the Chairman or, if appropriate, the Senior Independent Director.

Appropriate steps will be taken to ensure that the working environment and/or working relationship(s) are not prejudiced as a result of any disclosure.

The Group reserves the right to treat malicious or false allegations under the appropriate local disciplinary procedure.

Ownership, Approval Process, Changes and Deviations

This Policy was approved by the Board of Directors of Nationwide Hygiene Group and is reviewed annually. The policy is owned by the Chief Executive, and all updates, changes, deviations and supplements will be authorised by this role.

Darren Broad Chief Executive Officer

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