

Corporate Social Responsibility & Ethics Policy

MacLellan Rubber Limited are committed to achieving the highest standards in all aspects of its business, encompassed within this are principles through which we aim to impact positively on all aspects of our work life.

- Personal Safety
- Environmental Protection
- Respect for Human Rights
- Respect for Work colleagues
- Integrity in our Business Relationships
- Support for Colleagues and Host Communities
- Fair reward for work undertaken

Senior management is responsible for ensuring these principles are applied and as a result achieve strong, sustainable growth that benefits everyone.

As a general principle we aim to comply with all applicable laws, regulations and decisions of the countries in which we operate commercially, especially those concerning the environment, competition and employment.

We observe the rules of free competition and reject bribery and corruption in all forms, whether public or private, active or passive.

Employees:

- MacLellan's have confidence in the loyalty, motivation, competence and sense of responsibility of its employees. We expect them to adhere to the highest standards of integrity and avoid any conflict of interest.
- We pay particular attention to our employees' working conditions, respecting individuals, avoiding discrimination, and protecting their health and safety.
- We include our employees in our development by encouraging the distribution of information, dialogue and consultation.
- We respect their personal lives.
- We recruit personnel solely on the basis of our requirements and the specific capabilities of individual applicants.
- We develop their professional skills and careers without discrimination regarding race, gender, or affiliation with a political, religious, or union organization or minority group.
- All employees have a regular performance review with management, at which objectives are set, performance assessed and career development discussed.
- Career development is facilitated by appropriate training.
- We safeguard to health & safety of all employees.

MacLellan's policy regarding our partners, suppliers and our service providers is to:

- Respect each party's interests, with transparent and fairly negotiated contract terms.
- Expect them to adhere to principles equivalent to those in our Code of conduct.
- Expect them to apply principles that are compatible with our Business Principles and Rules of Individual Behaviour.

MacLellan expects its employees to make a positive contribution to the Companies' ethics policy, which they carry out in the course of their daily routine. It therefore requires its employees to adhere to the core values and principles expressed in the Code of Conduct. In particular, this involves:

- To strictly abide by all applicable legislation and regulation of all countries where we conduct business.
- To diligently apply the health, safety and environment rules.
- To build clear and honest relationships with customers, suppliers and associates.
- To ensure confidentiality of business information.
- To report corruption in our business.
- To act with loyalty and integrity towards the Company by avoiding conflicts of interest and insider trading.
- To refrain from intervening in the political arena of the countries in which they have no civil rights.
- To contribute to a positive working team environment.
- To use the assets of the Company responsibly and properly.

Reporting Concerns

We are all responsible for protecting our culture of Integrity and we therefore expect everyone to report any suspected violation.

We do not tolerate retaliation against anyone raising concerns in good faith.