



Code of Conduct for Ethical Trading

Status Instruments Ltd is committed to corporate management which takes responsibility for people and the environment. With this Code of Conduct, Status Instruments Ltd commits to compliance with applicable legal, social and ethical standards as well as to responsible and sustainable behaviour as company policy. In its dealings with suppliers and customers, as well as its own employees, Status Instruments Ltd is committed according to the values of this Code to fair and honest collaboration, with integrity. This is the foundation of our corporate culture.

Status Instruments Ltd informs its employees regarding the goals and behavioural principles of this Code of Conduct and obligates them to comply. All applicable laws, rules and guidelines pertaining to human rights, ethical trading, environmental protection and health and safety must be respected and followed without reservation. Furthermore, Status Instruments Ltd promotes compliance with the values of this Code of Conduct with its suppliers.

HUMAN RIGHTS

- **Voluntariness**

Status Instruments Ltd supports the UK Modern Slavery Act. Forced labour of any kind is strictly prohibited and the company adheres to the requirements of all applicable laws on remuneration and work hours.

- **Prohibition of Child Labour**

The legal provisions of applicable law on the minimum age of employees must be followed without exception. Status Instruments Ltd rejects all forms of child labour. Employees under 18 years of age are not employed for hazardous work and are subject to special protection through our Health and Safety risk assessments.

- **Respect and Integrity**

Human dignity and respect for people's personal rights and privacy are of great importance. Status Instruments Ltd does not accept any harassment or discrimination at the workplace on the grounds of skin colour, ethnic origin, age, gender, appearance, sexual orientation, disability, religion or political leanings. Sexual harassment or other personal attacks will not be tolerated. Status Instruments Ltd is committed to maintaining equal treatment and equal opportunities for its employees.

- **Confidentiality**

Status Instruments Ltd complies with all applicable laws for protecting the personal information of company employees and business partners, and has implemented the requirements of GDPR.

ETHICAL TRADING

- Prohibition of Bribery and Corruption**

Status Instruments Ltd is committed to applying the highest standard of integrity, honesty and fairness in its business activities. We take a zero-tolerance approach towards bribery and corruption in all its forms. The relevant anti-corruption laws are complied with.

No employee may offer, promise or grant unjustified advantages either directly or indirectly in connection with their business activities or have the same offered, promised or granted to them. Employees may not accept nor give gifts which can be reasonably assumed to have influenced business decisions. Violations are subject to disciplinary action.

Self-Assessment:

Does the company make any type of payments to government entities, including their employees, as part of the sales process? This includes gifts, entertainment and expenses as well as other payments.		NO
Has a criminal or civil judgement, penalty or lawsuit or any other proceeding involving corruption, money laundering or fraud ever been made against the company?		NO
Has the company or any director or senior manager of the company ever been investigated for violating any law relating to corruption, fraud or money laundering by offering, paying, promising to pay, receiving or authorizing the payment or receipt of any money or anything of value?		NO
Has the company ever been suspended or debarred by any licensing agency or government credentialing program, disbarred by any public international entity (e.g. the World Bank) or otherwise prohibited from selling to a government entity?		NO
Does any government department, agency, or any other type of government affiliated, owned or run entity, or any other current or former Public Official have any ownership or other financial interest in the company? Public Official: any official or a political party or candidate for political office; or any official or employee of any government agency, state-owned company or public international body, or any person acting on their behalf.		NO
Is any owner, director, principal, or employee of the business a current or former Public Official or related to any Public Official?		NO
Does the company have a policy in place which seeks to prevent slavery and servitude, forced and compulsory labour and human trafficking?	YES	
Does the company use workers supplied by a third party?		NO
Does the company make any deductions from workers' wages other than tax or deductions in each case required by law?		NO
What measures does the company take to seek to prevent slavery and servitude, forced and compulsory labour and human trafficking in its own supply chain? ANSWER: suppliers are monitored through questionnaires and declarations		
Are formal and fair disciplinary and grievance procedures in place for all staff?	YES	

What independent arbitration is available to employees?	
ANSWER: ACAS, industrial tribunals	
What is the age restriction for employees and how is adherence verified?	
ANSWER: 16, confirmed through birth certificate or passport	
Is the minimum wage paid in all circumstances and is it protected from disciplinary action e.g. fines? Are all staff eligible?	YES
Are there adequate hygienic facilities for the work force e.g. eating / toilet facilities?	YES
How is it ensured that temporary, seasonal or foreign workers receive the same rights as regular employees?	
ANSWER: all staff are permanent, with employment contracts	
How is discrimination actively discouraged?	
ANSWER: employees come from a wide range of backgrounds	

- **Prevent the Financing of War through Trade**

Status Instruments Ltd expects that our suppliers only supply products whose minerals stem from conflict-free or certified smelting plants. We require our suppliers to submit a declaration regarding the use of conflict minerals. Status Instruments Ltd has a Conflict Minerals Policy.

Self-Assessment:

Is there 3TG intentionally or otherwise added to our product(s)?	TANTALUM	YES	NO
	TIN		NO
	TUNGSTEN		NO
	GOLD		
If 3TG is present, is it necessary to the production of our product(s) and is it contained in the finished product(s)?	TANTALUM	YES	
	TIN		
	TUNGSTEN		
	GOLD		
Do we actively source data from our suppliers on 3TG?		YES	
Does 100% of the 3TG originate from recycled or scrap sources?		NOT KNOWN	
Have we declared all relevant smelter information received by our company?		YES	

Status Instruments Ltd has an Environmental Policy and a Health and Safety Policy.



MANAGING DIRECTOR

29th August 2018