

HOW TO REPORT A CONCERN



If you see a problem, speak up! Speaking up is everyone's responsibility. It is essential we investigate any potential breach of our ethical guidelines.



Speak to your manager first
If you have a concern the first thing to do is speak to your line manager or your line manager's superior.



Further support
Our Ethics and Compliance Officer will be available to support you.



Ethics and Compliance Hotline
If you are reluctant to speak directly to your manager you can contact our Ethics and Compliance Hotline. It is created specially to help employees report incidents. In most cases you can remain anonymous (unless local laws prevent this).



Non-retaliation
Every concern is dealt with respectfully and sensitively. We will never tolerate any form of retaliation against those who speak up.

REFLECT

NSG GROUP CODE OF ETHICS



WHY THE CODE OF ETHICS MATTERS

Ethical behavior is the key to sustaining our reputation and ensuring the financial success of our business. It is the foundation of our compliance with laws and Group policies. Our aim is to avoid any actions which undermine our reputation or contravene public standards.

In this way we will avoid costly fines and even more costly breaches of trust. In short, ethical behavior is a vital part of our future as a successful company.

The revised NSG Group Code of Ethics sets out the high standard of behavior we expect from ourselves and from others. We want to be the best we can possibly be, which sometimes means going above and beyond the minimum legal requirements.

For example, we do not tolerate:

- Actions which will endanger the health and safety of our employees, or the public
- Abuse, harassment or intimidation
- Failure to comply with legal obligations
- Competition law and bribery violations
- False accounting or false reporting
- Misuse of Group assets
- Improper relationships with customers, competitors or suppliers
- Actions which will cause damage to the environment
- Any other breaches of the NSG Group Code of Ethics

For more detailed information refer to the full Code of Ethics document which you can download from the Group policies section of the Intranet, or ask your local HR colleague for a copy of it.

THREE ACTION POINTS:

1. Take responsibility for behaving ethically. Every one of us has a part to play in making this happen.

2. Be open and transparent with colleagues, customers and suppliers.

3. Understand that an unethical decision in one part of NSG Group can have negative consequences in another part of the Group.

HOW TO DEAL WITH ETHICAL DILEMMAS



You may occasionally face situations that go beyond the information contained in the Code, where there is no clear solution and you are unsure what action to take. In these situations the following questions can help you make the right decision:

Is it legal?

Does it feel right?

How will I feel after my decision?

Would I be comfortable explaining myself to my colleagues, friends and family?

Would I be comfortable to see this issued in the media?

Would I be able to justify my actions in court?

If you are unsure what to do, no matter how trivial the issue seems, do not hesitate to speak up. NSG Group will always support you as we strive to set the highest possible ethical standards for our organization.