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SMYTHSON  
OF BOND STREET

Frank Smythson Ltd

# Code of Ethics

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## INTRODUCTION

This Code of Ethics (hereinafter also simply the “**Code**”) constitutes the set of ethical-social principles that Frank Smythson Ltd. (hereinafter also just “**Smythson**” or “**the Company**”) considers essential to follow when conducting business.

## RECIPIENTS AND SCOPE OF APPLICATION

The persons to whom the Code of Ethics applies are called “**Recipients**”. They are the directors and the members of the governing bodies of Frank Smythson Ltd. or subsidiaries, the staff of the Company, and all those who directly or indirectly, permanently, or temporarily, establish relations and relationships with Frank Smythson Ltd. or act to pursue the objectives in all countries where Frank Smythson Ltd. operates.

To ensure that the ethical principles and values expressed in the Code do not remain merely formal statements, they will need to be translated into concrete behaviour and actioned by all the Recipients, considering the importance of the roles, the complexity of the tasks and the responsibilities entrusted to them to pursue the Company’s objectives.

## GENERAL PRINCIPLES

Frank Smythson Ltd. considers loyalty in operations, transparency of information, respect for people and the environment, integrity and, in general, absolute respect of the laws and regulations in force in the territory in which it is located and operates, as fundamental principles.

Frank Smythson Ltd. intends to pursue its own commercial objectives in accordance with the principles and rules contained in this Code.

### 1. TRANSPARENCY AND CONFIDENTIALITY

Frank Smythson Ltd. performs its activities under the banner of transparency of information both internally and externally regarding relations with its customers, suppliers, and collaborators, and in such a way that the Company’s interest is made explicitly clear and, consequently, external parties are in turn able to make informed decisions.

At the same time, Frank Smythson Ltd. guarantees the confidentiality of all information and personal data that is processed, and the protection of information acquired when conducting business, standardising the requirements about confidentiality of personal data as referred to in The Data Protection Act 2018, and any subsequent amendments, additions and implementing regulations.

All recipients of the Code are required to maintain the confidentiality of information learned while performing their role or collaborating with the Company.

## 2. RESPECT FOR HUMAN RIGHTS AND THE ENVIRONMENT

Frank Smythson Ltd. recognises the supreme value of human beings and undertakes to respect and promote throughout its business operations the rights and freedoms of humans and workers based on the conventions of the International Labour Organisation (ILO), the internationally recognised code of labour practice The Ethical Trade Initiative (ETI) Base Code, and standard SA8000:2014, concerning:

- Freedom and regularity of employment as well as combatting forced labour
- Prohibition of inhumane and degrading treatment
- Freedom of trade unions and the right to collective bargaining
- Protection of workers' health and safety
- Prohibition of child labour and child exploitation
- The right to fair pay (which must reflect the amount of work, the technical skills and the role of the worker and be sufficient to satisfy basic needs and provide a decent wage)
- Voluntary nature and appropriateness of overtime
- Fair treatment of workers and prohibition of discrimination on grounds of race, social and economic condition, nationality, religious beliefs, age, disability, gender, marital status, sexual orientation, trade-union membership, or political orientation

The Company undertakes to take account of the environmental impact of its initiatives by behaving in such a way that does not result in adverse consequences for the environment. Smythson is aware of the impact of chemical substances on the environment and human health and is committed to complying with all relevant chemical management law and rules, and the elimination of hazardous chemicals from its production cycle, in favour of safer and sustainable alternative materials.

## 3. COMBATTING CORRUPTION AND CONFLICTS OF INTEREST

The Company, in line with the values of integrity and transparency, undertakes to put in place all the necessary measures to prevent and avoid situations of corruption. In this regard, in external relations, offers of money, gifts or benefits of any kind to individuals to obtain any real or apparent undue advantages, are not permitted.

Acts of commercial courtesy are permitted, providing they are of modest value and do not compromise integrity, reputation and do not influence the recipient's independent judgement.

If an employee or collaborator directly or indirectly has a conflict of interest, even with that of the Company, they have a duty to suspend the activities and inform their line manager. In addition, for the purposes of preventing the risk of any conflicts of interest, directors and managers are expected to avoid situations in which conflicts of interest may arise and must not personally benefit from business opportunities that they become aware of while performing their tasks.

## 4. COMPETITION

The Company recognises fair competition as a fundamental element of national and international social and economic development. To this end, when conducting its business, it ensures that the general conditions for

business freedom are respected, allowing economic operators to be able to enter the market and compete with equal opportunities and protection for its customers, thus encouraging price limits and improvements to the quality of the services that stem from free competition.

## 5. INTELLECTUAL PROPERTY RIGHTS AND COMBATting COUNTERFEITING

Frank Smythson Ltd. expressly rejects any type of counterfeiting and undertakes to promote the observance of the law and to object to any initiative involving the production and sale of non-original products.

Smythson is committed to respecting the intellectual property rights of third parties, according to the laws, regulations, and conventions within the UK, EU and/or internationally on the protection of such rights. Frank Smythson Ltd. expects that all its partners, suppliers and employees take the intellectual property rights of the Company and other third parties into due consideration in their operations, relationships, and daily business.

Frank Smythson Ltd., moreover, encourages and promotes innovation and technical development of the product and processes performed by its employees and third parties who work with and for the Company.

## RELATIONS WITH STAKEHOLDERS

‘Stakeholders’ refers to individuals who are directly or indirectly involved in Frank Smythson Ltd.’s business and who have an interest in its activities. Stakeholders therefore include, purely by way of example and not limited to: employees, shareholders, customers, suppliers (of raw materials and labour), contributors of any kind, consultants, institutions, authorities, trade associations, environmental associations and, more generally, anyone involved or interested in the Company’s activities, locally, nationally and internationally. Proper relations with these subjects are one of the Company’s fundamental objectives.

## 6. RULES OF CONDUCT FOR SUPPLIERS

In the interest of building stable and lasting trade relations to benefit the quality of work and the dissemination of the values and principles of this Code, Frank Smythson Ltd. undertakes to select its suppliers and external contributors based on professionalism, reliability, affordability, transparency, quality and regulatory compliance. To this end, the executives, and employees responsible for supplier selection processes shall verify that they comply with regulatory and conventional standards concerning social-ethical and environmental matters.

Formal acceptance of and complying with the principles and values expressed and recalled in the Code is a necessary condition for forming and maintaining a commercial relationship with Smythson, based on loyalty, correctness, and transparency of information.

## 7. RULES OF CONDUCT FOR CUSTOMERS

Frank Smythson Ltd. bases its commercial policy on the principles of transparency, fairness, integrity, professionalism, availability and confidentiality.

## 8. RULES OF CONDUCT FOR MANAGING HUMAN RESOURCES

The Company recognises the central role of human resources in achieving the business' objectives and consequently adopts procedures and methods for the selection, management and training of staff based on respect for human beings, workers, and meritocracy. It is against any form of discrimination and promotes participation, professional development, and the sharing of the Company's purposes by all.

## 9. RULES OF CONDUCT FOR RELATIONS WITH THE PUBLIC ADMINISTRATION

Relations with the public administration are based on maximum transparency, clarity, impartiality, fairness, and maximum collaboration.

To this end, the following is prohibited: offering, either directly or through an intermediary, money, or another benefit, to seek or establish personal relationships of favour, influence, or interference; making benefit donations or improper payments with the aim of directly or indirectly influencing the activity of officials and representatives of the public administration in the performance of their duties.

Acts of courtesy (such as gifts and forms of hospitality) to the afore mentioned are not permitted unless they are of modest value and of such a nature that they may be considered a usual recurring event and do not compromise the integrity and reputation of the Company or influence the recipient's independent judgement. Any costs attributable to acts of courtesy referred to above should always be assessed and authorised according to specific business processes and appropriately documented.

## 10. RULES OF CONDUCT FOR RELATIONS WITH SHAREHOLDERS

Frank Smythson Ltd. shares the system of values which places human beings at the centre of the business plan with its shareholders.

## 11. RULES OF CONDUCT FOR RELATIONS WITH INFORMATION BODIES

The relations between Frank Smythson Ltd. and the media in general are taken care of by persons and employees responsible for this, in accordance with internal procedures, to ensure that information and external communications are always accurate and truthful, complete, transparent, and properly disseminated.

## 12. LOCAL RELATIONS

Each recipient is responsible for helping to reduce the environmental impact of the whole organisation, starting with small daily actions.

Frank Smythson Ltd. supports the protection of the environment, investing in clean industrial technologies, encouraging the use of renewable energy sources, improving resource efficiency and supporting research into technologies with a low environmental impact. It is also committed to disseminating key messages relating to environmental protection, to strengthen the whole industry's commitment to a culture of sustainability.

## 13. DONATIONS, SPONSORSHIP AND PARTNERSHIPS IN SUPPORT OF THE COMMUNITY

Actively and responsibly participating in the life of the communities in which it operates is a fundamental value for Frank Smythson Ltd.

All promotional activities should be aimed at beneficiaries whose interests do not conflict with the principles of the Code of Ethics and correspond with activity worthy of protection by the legal system and that ensure the traceability of operations and transparency in decisions.

## 14. INTERNAL REPORTING OF BREACHES

Every employee and contributor must take an active part in promoting the values of the Code of Ethics. Therefore, any Recipient that becomes aware of a breach of the principles contained and recalled in the Code of Ethics is obliged to report it according to internal procedure.

Whatever the channel used, Frank Smythson Ltd. undertakes to preserve the anonymity of the complainant and to ensure that they are not subjected to any form of retaliation.

## 15. SUPPLY CHAIN MONITORING

Smythson's suppliers and business partners, by signing the Code of Ethics, undertake to observe it and implement it in their commercial operations.

Frank Smythson Ltd. reserves the right to check and supports the afore-mentioned persons in the implementation of the Code who, conversely, undertake to provide the staff hired by the Company with free access to the company's premises and documentation when requested from time to time.