

ETHICS & BUSINESS INTEGRITY STATEMENT

Behaving ethically is essential to the way we operate and the success of our business. Our values of Openness, Collaboration, Mutual Dependency, Professional Delivery, Sustainable Profitable Growth and Innovation guide our behaviours and the standards we set for ourselves as employees of Harper Group. It is fitting that they are the cornerstone of our Ethics and Business Integrity Policy.

As individuals, collectively and as a company, we will:-

- Apply the principles set out in the Ethics and Business Integrity Policy in everything we do.
- Ensure that we comply with company policies and procedures.
- Comply with applicable laws, rules and regulations and where the standards of behaviour expected by Harper Group are higher we will apply these higher standards.
- Seek guidance where we are unsure of the appropriate course of action.

The Ethics and Business Integrity Policy sets out the standards and behaviours that all our people are expected to meet. The document also provides more detailed information on the issues it covers via links to policies and procedures. It also identifies who you can ask for help, as it cannot give you the answer to every situation or event that you may face in your role. However, it seeks to provide the primary guidance you should follow and sets out an Ethical Decision Making Tool. This should help you consider if your course of action is appropriate or if you need to seek further advice and guidance from the sources set out in the Policy.

The Policy has the support of the Board. Our reputation and future success depends on everyone in the Harper Group acting in accordance with the law and the ethical standards set out in this policy.



A.P. Rees
Group Managing Director

Dated: 31st January 2018

Next Review: 31st January 2019