

CELNOR GROUP

Celnor Group Code of Conduct

Policy Title	Celnor Group Code of Conduct
Issued By	Celnor Group
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Introduction and Scope

Celnor Group Limited is committed to conducting its business ethically, responsibly and with integrity. This Code of Conduct sets out the core principles and standards of behaviour expected of those working within the Celnor Group and provides a shared framework to guide decision making and professional conduct across the organisation. The Code supports Celnor's values, governance arrangements and wider ESG framework. It is intended to promote a positive culture based on trust, accountability, professionalism and respect.

This Code applies to Celnor Group Limited and sets out the minimum standards expected across the Group. It applies to all Group directors, employees and workers. Where Group companies maintain their own codes of conduct or equivalent policies, these must be aligned with, and support, the principles and expectations set out in this Code.

Separate codes or standards apply to suppliers, subcontractors and other third parties.

Responsibilities

All individuals within scope of this Code are expected to:

- act honestly, professionally and responsibly at all times
- comply with applicable laws, regulations and recognised standards
- act in the best interests of Celnor and its stakeholders
- avoid conduct that could damage Celnor's reputation or trust

Leaders and managers have a particular responsibility to:

- lead by example and set appropriate standards of behaviour
- promote and reinforce the principles set out in this Code
- create an environment where concerns can be raised openly and without fear

The Code

Ethical behaviour and integrity

Celnor has zero tolerance for unethical conduct. Individuals must not engage in, support or tolerate behaviour that is dishonest, misleading or abusive of trust.

This includes, but is not limited to:

- fraud or financial misconduct
- bribery or corruption
- improper payments
- conflicts of interest that are not declared and appropriately managed
- misuse of Celnor assets, information or authority

Any actual, potential or perceived conflicts of interest must be disclosed promptly in accordance with Group arrangements.

Celnor is committed to acting responsibly towards the environment and minimising environmental harm through the way it operates and delivers services.

Fair competition and professional standards

Celnor is committed to competing fairly and professionally.

All individuals must:

- comply with applicable competition and market conduct laws
- avoid anti-competitive behaviour or inappropriate sharing of information
- act impartially and objectively in the delivery of services
- maintain high professional and technical standards relevant to their role

People, dignity and respect

Celnor is committed to providing a safe, inclusive and respectful working environment.

Individuals are expected to:

- treat colleagues, clients and others with dignity and respect
- avoid discrimination, bullying, harassment or intimidation
- support equality of opportunity and fair treatment
- contribute to a positive and inclusive culture

Celnor does not tolerate behaviour that undermines the wellbeing, safety or rights of others.

Health, safety and wellbeing

Protecting health, safety and wellbeing is a core priority across the Group.

All individuals must:

- comply with health and safety requirements and procedures
- take reasonable care of themselves and others
- report hazards, incidents and unsafe practices promptly

Leaders must ensure that health and safety responsibilities are understood and effectively managed.

Human rights and modern slavery

Celnor respects internationally recognised human rights and is committed to preventing modern slavery and human trafficking.

Individuals must:

- be alert to human rights risks within their area of responsibility
- raise concerns where suspected exploitation or unethical practices are identified
- act in accordance with Celnor's Modern Slavery and Human Trafficking Policy

Information, data and confidentiality

Celnor is committed to protecting information, data and confidentiality.

Individuals must:

- handle information responsibly and in line with applicable policies
- protect personal data and confidential information
- avoid unauthorised disclosure or misuse of information

These obligations continue after employment or engagement ends.

Raising concerns and whistleblowing

Celnor encourages a culture of openness and speaks-up behaviour.

Concerns about suspected misconduct, unethical behaviour or breaches of this Code should be raised promptly using appropriate reporting channels. This includes local arrangements and the Group whistleblowing route supported through the Celnor Speak Up initiative.

Individuals who raise concerns in good faith will be supported and protected in line with Celnor's Whistleblowing Policy.

Compliance with the Code

Compliance with this Code is a condition of working within the Celnor Group.

Breaches may result in corrective action, which may include disciplinary measures where appropriate. Celnor will take proportionate action where misconduct is identified.

Review

This code is reviewed periodically to ensure it remains suitable, effective and aligned with legal requirements, Government guidance and Celnor's governance and wider ESG framework. Any significant updates will be communicated across the Group.

Approval

This policy has been approved by the Board of Directors of Celnor Group Limited.



Signed: -----

Name: Simon Parrington

Title: Group Chief Executive

Date: June 2026