



STANDARD PROCEDURE  
Ethics and Corporate Social Responsibility Statement

The Martin Group of Companies recognises that our social, environmental and ethical conduct has an impact on our reputation. We therefore take our Corporate Social Responsibilities ("CSR") seriously and are committed to advancing our policies and systems across the Group to ensure we address and monitor all aspects of CSR that are relevant to our business. These include good ethical behaviour, concern for employee health and safety, care for the environment and community involvement.

We strive to maintain a productive and open dialogue with all parties who may have an interest in our activities including customers, suppliers and employees. We have an established investor relations programme, conduct regular customer satisfaction surveys, monitor supplier performance and actively encourage feedback from our employees.

The Board takes ultimate responsibility for CSR and is committed to developing and implementing appropriate policies while adhering to a fundamental commitment to create and sustain long term value for its growth.

As a Group driven largely by technological innovation, our main assets are the talents and skills of the people we employ. The Board does not believe that, to date, the activities of the Group present any significant environmental risks. We have established a committee to coordinate Group-wide CSR efforts.

The Martin Group expects that all of its business is conducted in compliance with high ethical standards of business practice. We apply these standards to all dealings with employees, customers, suppliers and other stakeholders.

The Group's Ethics Policy, which has been approved by the Board, has been developed to ensure that the Group's business is conducted in adherence with high ethical and legal principles and sets standards of professionalism and integrity for all employees and activities.

The Company supports the International Labour Organisation's Global Employment Agenda and fully complies with the international labour standards in relation to employment and ethical policy, as set out in the employment Policy Convention (1964) and Employment Policy (Supplementary Provisions) Recommendation (1984).

The following is a summary of the Ethics Policy:

- 1) All employees have the right and responsibility to ensure that the Martin Group's business is conducted with high ethical and legal principles;
- 2) Our policy is to operate within applicable laws; including Freedom of Information Act 2000.
- 3) Discrimination or harassment of any kind will not be tolerated;
- 4) As a matter of policy, we do not make political donations;
- 5) No bribes shall be given or received;
- 6) All conflicts of interest must be avoided;
- 7) We aim to be a responsible partner within our local communities; and
- 8) Employees are encouraged and supported to report, in confidence, any suspected wrongdoings. Appropriate ethical behaviour is reviewed as part of the Group's internal control process.

Any deviation to this policy will be dealt with at board level via our grievance or disciplinary procedures.

H W Martin - Chairman