

A commitment to our **global** team...

**CODE OF CONDUCT**

[www.acti-chem.co.za](http://www.acti-chem.co.za)

# OUR **WORLDWIDE** CODE OF CONDUCT



Mexico

USA

Brazil

UK

France

Spain

Germany

Italy

South Africa

Malaysia

China

Japan

Australia

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## A message from Giuseppe De Lucia

Being part of Thor is being part of an incredible global team that has made this organisation the success that it is. I'm proud to be part of the team at this important point in our journey.

We make a difference to the world at large. We provide products that are used to keep people safe, looking good and feeling great.

We're trusted to deliver and that trust is integral to everything we do. We must stay focussed on maintaining that trust and acting at all times with integrity.

Our **Code of Conduct** is our guide to how we conduct business, both internally and customer facing. It guides us and ensures we act with integrity and hold ourselves to the highest standards of responsible and ethical behaviour. Our Board of Directors will review the **Code of Conduct** annually to ensure that it remains fit for the purpose of maintaining our philosophies and values.

I ask you to make sure you read, understand and adhere to the **Code of Conduct**. As part of the Thor team we all have a part to play in making sure we always look after our fellow team members, provide our customers with quality products and do the right thing.



**GIUSEPPE DE LUCIA**  
Main Board Director

“I'm proud to say that I'm part of the Thor family and I understand and uphold the Code.”

## Our values

### TRUST

**We work as a team**

We earn trust from our employee family, customers and business partners with our competency, integrity and ability to succeed.

### HONESTY

**We deliver on our promises**

We always operate honestly and ethically in everything we do and with everyone with whom we connect.

### OPTIMISM

**We believe in our future**

We see opportunity where others see problems and we use these opportunities in our quest for success.

### RESPECT

**We treat everyone with dignity and respect**

We believe that everyone should enjoy an environment free from discrimination and harassment.



## It's Our Code

### Our Code of Conduct

#### What is the Code of Conduct?

The Acti-Chem **Code of Conduct** (*our Code*) outlines our commitment to and gives guidance on how we do business regarding standards of integrity and ethics. It describes the basic rules of conduct that we are expected to follow. The Code also assists us in applying these rules and policies in practice by giving us guidance on actions and behaviours that match our company values.

#### Who has to follow the Code of Conduct?

The Code applies to **everyone** doing Acti-Chem business.

This is wide ranging and includes all of Acti-Chem's businesses, divisions and offices. It also applies across all jurisdictions where the organisation operates. It applies to all employees (*whether temporary, fixed-term, permanent, paid or unpaid*) and all Officers, Trustees, Board and/or Committee members at any level.

If the code says **we, us, our, you** or **I**; you should interpret this as meaning that it **applies to everyone** at Acti-Chem.

Acti-Chem has also made a commitment to do business only with others who share our values and undertake their business with the highest standards of integrity and ethics.

#### What are our obligations?

Acting with integrity and undertaking business ethically is a requirement of working at Acti-Chem. We are all expected to read, understand and follow the Code. All existing employees are asked to sign-up to the Code, demonstrating that they understand it and will follow it acting with integrity at all times. New employees will be asked to sign-up at the very start of their journey with Acti-Chem when accepting their contract of employment.

The Code acts as our guide for business conduct. It is written to give us guidance and support to assist us in making the correct decisions to act ethically and in compliance with the laws that affect us. We are a global organisation and subject to a vast number of laws, regulations and situations in our daily business lives. This means the Code cannot cover everything - it is your responsibility to learn about any additional requirements that may apply to you.

If you are in any doubt you should seek guidance from your local Human Resources Manager or Global Compliance.

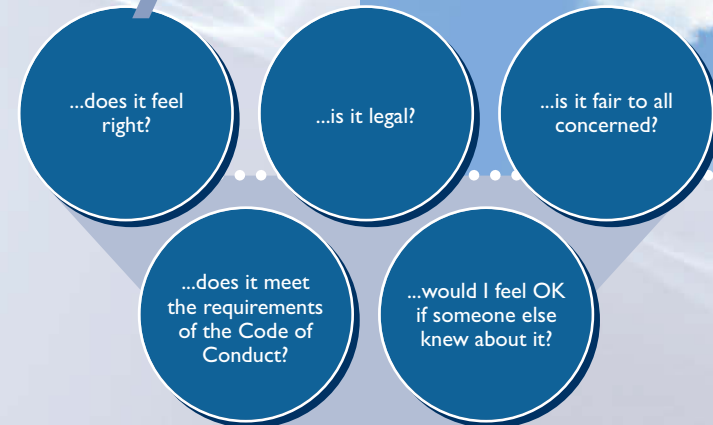
#### What happens if the Code of Conduct is breached?

Not following the Code can have serious consequences for us as individuals and for Acti-Chem as an organisation.

Breaching the Code may lead to disciplinary action, up to and including termination, in line with local guidelines and regulations.

SO, before you act,

# ask yourself...



If you **can't answer yes** to **all** of these then you need to stop and think again.  
It's **always OK** to ask for help.

### Asking for advice

You may face difficult situations in your work.

Our Code and your good judgement may be enough to guide you in the correct actions to be taken. However sometimes you may need help to make the correct decisions.

You should speak in the first instance with your manager and if you need further help you can speak with your **HR Team** or **Global Compliance**.



WASTE

SAFETY

FRAUD

BULLYING

ENVIRONMENT

CONFLICT OF INTEREST

When should I...

# Speak

THEFT

CORRUPTION

DISCRIMINATION

HARASSMENT

If you see something that you suspect is unethical, illegal or contrary to our values and the Code you should speak up. It may seem the easy option to look the other way - but not living up to good business and personal practices affects all of us.

Remember no concern is too minor to report.

### How do I speak up?

If you feel you are in a position to challenge the behaviour you should do so appropriately.

# UP

If you feel you are not in a position to challenge the behaviour yourself, your manager will usually be the best person to listen to your concerns and take the necessary action. If you feel unable to speak with your manager you can approach your HR Team or another member of senior management.

It's not always going to be easy to raise your concern with someone within the organisation. In these circumstances we should report concerns to **SpeakUP**, the ethics and compliance hotline. This is a service run by an independent third party which is available 24/7 in all countries where we have operations.

**SpeakUP** allows anonymous reporting. We would ask though that you give your details if you feel you are able to allow us to complete a full investigation.

### What happens when I make a report to the **SpeakUP** Hotline?

You may leave a phone or web report with your concern; both of these can be anonymous if you prefer. You will be given a case number for your concern and this is the reference number for you to check back on the status of your report.

Once received, details of your report are passed to the company Global Compliance Department who will then ensure that the report is investigated in the most appropriate way.

All reports are taken very seriously and you can be assured that processes are in place to ensure they are handled correctly.

The **SpeakUP** programme is reviewed regularly by the Board of Directors, this includes reports, investigations and results of these investigations.

### Anti-retaliation

It takes courage to raise your concern, but you should feel safe to do so. Retaliation for asking questions, making a good faith report or participating in an investigation will not be tolerated regardless of whether the concern turns out to be unfounded or not.

### What does Good Faith mean?

A good faith report is a concern that you genuinely believed to be correct. It does not matter if the report is subsequently found to be unfounded as long as all truthful information was given at the time to aid in the investigation.



**SpeakUP** Hotline  
[www.actispeakup.com](http://www.actispeakup.com)

Or use the free phone number for your location.  
 This can be found in the **Thor Whistleblowing Policy**

## Our workplace

### Health, Safety and the Environment

#### What do we mean?

Good management of our health, safety and environmental performance is integral to our success, it's how we operate each and every day.

#### What do we believe?

We believe in and are committed to looking after the health and safety of all employees, visitors and others who may be impacted by our operations. We are also committed to conducting our business in an environmentally responsible manner.

Our aim is to meet or exceed compliance with all health, safety and environmental laws and regulations.

#### Staying safe and a good environmental ambassador

We always follow our health, safety and environmental policies and procedures. We also ensure that operations are carried out in compliance with local health, safety and environmental laws and regulations.

We look out for our fellow workers and others who may be impacted by unsafe conditions or acts. We take care of the environment and make sure that our environmental impact is controlled.

#### What if I see something wrong?

If we see something that could put us, others or the environment at risk we don't walk past or ignore it - we take action. At all times, we take an active part keeping ourselves, others and the environment safe.

We **all** need to take an active part in managing the health, safety and environmental risks of the company.

#### We make sure:

- If PPE is required, we wear it and treat it as if it's our own.
- If a procedure needs to be followed to keep us safe, we follow it.
- If training is required, we complete it.
- If it doesn't look right, we take action or we report it.

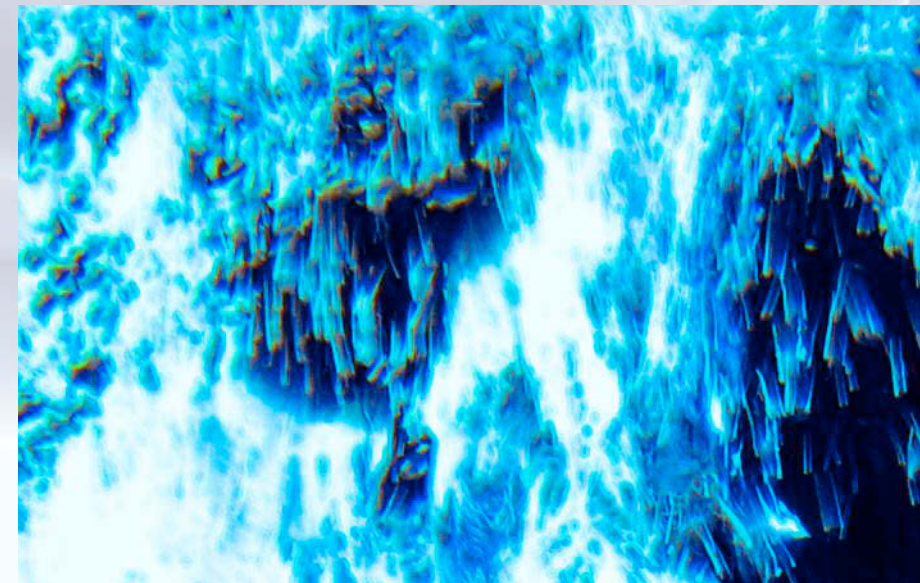
#### Scenario:

**Q:** Maria has a small quantity of hazardous waste to dispose of. The disposal area is a long walk and it's raining. She knows it's unlikely to cause a problem if she puts it down the rain water drain because rain water will dilute it. **Is it ok for Maria to dispose of the waste that way?**

**A: No it's not OK.** Maria needs to follow the onsite hazardous waste disposal procedures every time. As well as taking her personal obligations seriously, she should be aware that the site is likely to have strict permit requirements that disposing of waste in this way will breach.

**Q:** Trevor works in an area that has a mandatory safety glasses requirement. His prescription safety glasses got broken yesterday, he reported it and HSE have ordered him a new pair. He knows he can't work without eye protection. **What should Trevor do today?**

**A:** Trevor should ask his Health and Safety Manager what alternatives he can use. These might include over glasses (*so he can wear his normal specs underneath*), goggles or a visor.





## Dignity and Respect

### What do we believe?

We believe in an inclusive and diverse workplace where everyone connected with us is treated with dignity and respect.

### Diversity and inclusion

We always treat everyone we connect with fairly regardless of their personal beliefs or differences. Selection should be based solely on merit with everyone having the same opportunities regardless of their personal beliefs or differences.

### Harassment

We never bully or harass anyone. This means we will never violate an individual's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

We should remember that bullying and harassment can be physical, verbal or written. It can include words, pictures or statements. It can be transmitted by post, phone, fax, video, text message, email, a screen saver or via social media etc.

## Respect and responsibility

In all communications whether face to face, virtual or written we must always be respectful. In line with our company values we should always be open and honest.

### Scenario:

**Q:** Jon has an open position in his department. He asks HR to send him only CVs for people under 40 as he thinks older workers are too slow to pick up the skills he needs them to have. **Is it OK for Jon to do that?**

**A: No.** It's never OK to discriminate and Jon is violating company policy and the Code of Conduct. Age is also a legally protected characteristic, HR needs to give Jon some further guidance.

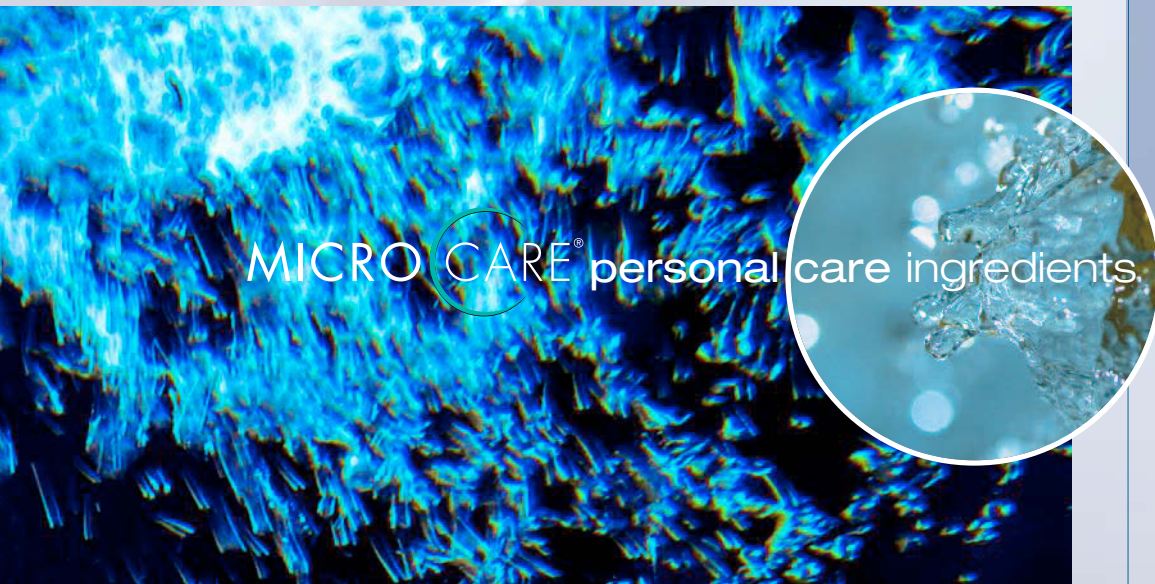
We celebrate Acti-Chem as a place of diversity and inclusion and we don't discriminate or harass anyone based on their personal beliefs or difference.

### This could include:

- Age.
- Disability.
- Gender reassignment and gender identity.
- National origin.
- Sex or sexual orientation.
- Marital or civil partnership status.
- Family status including pregnancy, maternity, paternity or other carer status.
- Race including ethnic origin.
- Genetic information.
- Religious, political or other beliefs.
- Full-time or part-time status.

Related Group policies:

- **Thor Anti-Discrimination and Anti-Harassment Policy**





## Drugs and alcohol

### What do we believe?

Alcohol and substance abuse limit our ability to do our jobs safely and efficiently which puts us all at risk.

We should report fit for duty at all times.

### What are my responsibilities?

We must never be under the influence of alcohol, illegal drugs or a lawfully prescribed prescription drug which affects our performance or creates a risk to safety whilst at work or undertaking work for the company.

We must never undertake the unlawful use, purchase, sale, possession, distribution, transfer, or manufacture of alcohol (*this includes legal manufacture except when associated with company business*), illegal drugs or controlled substances, while on company property, while operating company machinery or vehicles, or while conducting company business.

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#### Scenario:

**Q:** David's co-worker Trev drives the FLT in the area where they work. Often after lunch David can smell alcohol on Trev's breath and he has seen him driving erratically. **What should David do?**

**A:** David should report the matter to his line manager or the HR Department. If David doesn't feel he can speak to someone directly, he could use the **SpeakUP** Hotline. If someone is under the influence of alcohol at work they put all of us in danger.

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Related Group policies:

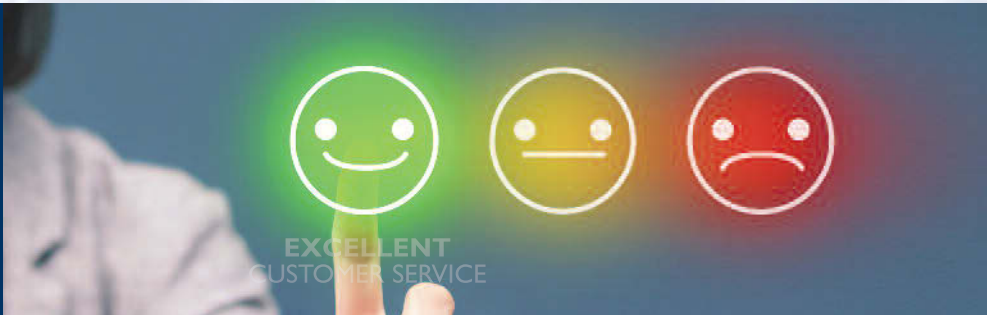
- **Thor Drug and Alcohol Policy**

## Quality

### What do we believe?

We've built our reputation and our business on **excellent customer service** and providing quality products that meet or even exceed what our customers require.

We believe that everything we produce should be to the best possible quality and meet all the requirements of applicable laws and regulations.



### Working to ensure that we produce quality products

We always comply with quality control standards, procedures and customer agreed specifications. In addition to making sure we ourselves produce quality products and services we make sure our suppliers and others who supply us products and services meet the same high standards.

We always report any non-conformance with quality standards to line management and ensure that correct action is taken.

#### Scenario:

**Q:** Mo knows that if he heats a product mix 5°C degrees higher than the internal quality procedure requires, he can make the final mix quicker and produce more batches in his shift. **Is it OK for him to do that?**

**A: No.** Mo must follow the quality procedure to ensure that the product is produced to the expected standard. The company is always looking to improve so Mo should then feel free to speak with his line manager to make the suggestion, which may then be investigated fully.

## Honesty and Integrity

### Bribery and Corruption

#### What does it mean?

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of advantage so to induce or influence an action or decision.

#### What do we believe?

We believe that our business should be conducted at all times with the highest standards of integrity and honesty. We do not allow others who act for us to breach any of the requirements that we ourselves must comply with.

#### Bribery and corruption

We never engage in bribery or corruption in any form. We do not give, offer or receive anything that could be considered a bribe.

#### Facilitation and grease payments

We do not make facilitation or grease payments to grant an advantage or facilitate an action to which we are otherwise legally entitled.

#### Political and charitable donations

We do not make donations, in cash, kind, or by any other means, to support any political parties or candidates. It is recognised this may be perceived as an attempt to gain an improper business advantage. We only make charitable donations where we are certain that the donation is fit and proper and cannot be viewed as an influencing behaviour. We must seek approval of Global Compliance before any donation is made.

#### Scenario:

**Q:** Susan is at a customer negotiating the price of goods we are going to supply. At the start of the meeting the customer gives Susan a pen to use during the meeting and to keep as a personal memento. **Is it OK for Susan to keep the pen as a gift?**

**A:** If the pen was of nominal value and not intended to influence Susan, then yes.

Related Group policies:

- **Thor Anti-Bribery and Corruption Policy**

## Gifts and hospitality

### What does it mean?

The exchange of legitimate gifts and hospitality that build goodwill in business relationships.

### What do we believe?

We believe that gifts and hospitality providing they are not excessive and are appropriate to the circumstances can be an acceptable part of business relationships.

### Gift and Hospitality

We never give, offer or receive a gift or hospitality if the act of doing so may be seen to influence.

Gifts and hospitality can be an acceptable part of business.

*However, we know if giving or receiving we should ensure:*

- It is not done with the intention of influencing the party to whom it is being given.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with international and local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent eg: *a voucher or gift certificate.*
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.



ACTICIDE<sup>®</sup> Biocides...

Related Group policies:

- **Thor Anti-Bribery and Corruption Policy**

## Conflicts of Interest

### What does it mean?

When employees' personal interests either influence, have the potential to influence, or are perceived to influence their decision making, a conflict of interest situation results.

### What do we believe?

We always try to avoid conflicts of interest or any situation that may be perceived as a conflict of interest.

Where we feel it cannot be avoided we report the situation promptly to our line manager and Global Compliance.

### Working to avoid Conflicts of Interest

We discuss any potential conflicts of interest openly and honestly with our line manager. We agree and abide by a workable plan to manage the situation.

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### Scenario:

**Q:** Peter works in the Purchasing Department and would like to place an order for chemicals to use in his Acti-Chem site. Peter thinks that a company his brother works for as a sales manager is the best place to purchase these chemicals.

**Is it ok for Peter to place the order with Rob his brother?**

**A:** Peter should let his line manager know and then remove himself from any negotiations in relation to the order. The order should then follow the normal purchasing procedure with no input from Peter.

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Being able to recognise a potential conflict can help you avoid one.

*A conflict of interest can occur in the following situations:*

- Personal workplace relationships eg: hiring or supervising a closely related person.
- Outside employment eg: having a second job which has the potential to prevent you from fulfilling your duties to the organisation.
- Ownership or financial interest of an external organisation eg: *owning a share of a supplier while in a position to steer Acti-Chem business towards it.*
- Using company equipment or means to support an external business eg: using the company van to deliver your personal goods.
- Relationship with a supplier or customer eg: you have a family member who is at a level in the organisation that may give the appearance that it could affect your judgment, decisions, or actions in your dealings.
- External mandates eg: serving on the board of directors of another company.

Related Group policies:

- **Thor Conflict of Interest Policy**



## Respecting Human Rights

### What does it mean?

Treating everyone with dignity and respect and allowing freedoms that are expected in a modern society.

### What do we believe?

We respect fundamental human rights and are committed to the principles set out in the United Nations Universal Declaration of Human Rights.

We abide by local employment law wherever we operate. All suppliers and business partners associated with the company are required to comply with these same standards.

### What are my responsibilities?

We abide by all local laws relating to employment terms and treat everyone with respect and dignity.

When dealing with suppliers and other business partners we expect them to uphold these same principles.

## Modern Slavery

### What does it mean?

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

### What do we believe?

We believe that nobody should be subject to modern slavery and we will not tolerate it in any business connection with the company. We will not knowingly do business with any party that is involved in modern slavery.

### What are my responsibilities?

We abide by international conventions and laws relating to modern slavery. We keep aware of our own work environment and that of our business partners to ensure that the company remains in compliance with its commitment to not knowingly engage in modern slavery.

### Modern Slavery - Key Points:

- **Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.**
- **Human trafficking consists of three basic components: action, means and purpose of exploitation. All three components must be present in an adult trafficking case; for child trafficking the 'means' component is not required.**
- **In human trafficking cases, exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and removal of organs.**
- **Some people may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour.**
- **Human trafficking is not the same as human smuggling. There are common myths about modern slavery, such as misconceptions that UK nationals cannot be victims and that a person cannot be a victim if they reject offers of help.**

UK Home Office, Statutory Guidance

## FAIR Competition

### What do we believe?

We believe that our business should compete in a lawful, fair, and ethical manner.

We always compete for and do business solely on the basis of merit and open competition.

### Dealing with customers

We deal fairly with our customers. We deal only in facts and are truthful when we discuss our product quality, purpose and availability.

We do not engage in tying of products by making a customer purchase one product to be allowed to purchase another.

### Dealing with competitors

We do not engage with competitors to fix prices, undertake bid rigging, market allocation, control production or any other competition restricting action.

Likewise, we do not discuss our business and how we undertake that business with our competitors.

### Market information

We gain market intelligence in accordance with the law, through legal means. We never use deception or confidential information for competitive advantage.

#### Scenario:

**Q:** Callum, the Sales Director in one of our divisions, goes to lunch with his friend who is the Sales Director of a competitor selling the same products as Callum. Callum's friend suggests that if he lets him deal exclusively with company A, he will let him deal exclusively with company B. This is a great opportunity to concentrate his limited resources. **What should Callum do?**

**A:** Callum should stop his friend from discussing it immediately and let him know that Acti-Chem doesn't do business this way. In addition, he should inform his local management and Global Compliance of the discussion. In short, he should not take up the offer in any way.

- We **must** comply with Acti-Chem anti-trust and competition policy and international and local laws relating to antitrust and competition.
- We **must** always deal fairly with everyone we come in to contact with or have a connection with as part of our business dealings; this includes our customers, suppliers and competitors.

Related Group policies:

- **Thor Anti-Trust and Competition Policy**

## Trade Controls

### What do we mean?

When exporting or importing goods or services we are subject to local and international laws. These laws dictate if and when we can export or import, and what permissions etc. we require.



### What do we believe?

We believe that all of our business operations should comply with applicable local and international trade law.

### What are my responsibilities?

We understand that there are specific requirements for the export and import of goods and services between countries and that these may restrict the way we do business.

We make sure that if involved in the import or export of goods or services that these are done in compliance with international trade law.

We make sure that when exporting we know of our product's final destination and its intended use. We do not participate in shipping our products through one country to allow shipment to another if the shipment to either is against international trade laws.

## Accurate Records

### What do we mean?

Business records are used to make public disclosures and provide information for production processes, customers, regulators and others. The company also makes important business decisions based on these records.



### What do we believe?

We are trusted to keep accurate records of everything we do. We have a duty to ensure that information we gather and record is accurate, correctly recorded and retained.

### What are my responsibilities?

We ensure that any records we are required to make are accurate and contain all necessary information. We are honest in what we record and do not hide or omit information to alter the recording process.

We do not dispose of records that are required to be retained or dispose of records that are or may be called for in any regulatory process.

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### Scenario:

**Q:** Lise works in sales and wants to show progress in her weekly order volumes. It's the last day of her reporting week and she has just received a commitment of an order that will be placed the next day. **Can she record it in the report she is about to submit?**

**A: No.** She can't record this as a sale as there is no order as yet. All information must accurately reflect what is to be recorded in the report.

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We ensure that any records we are required to make are accurate and contain all necessary information.

*These can include (but are not limited to):*

- Financial records
- Permit records
- Environmental monitoring records
- Health and safety records
- Expense reports
- Production/quality records
- Shipping records
- Stock records
- Export and import records
- Customer records
- Supplier records
- Facility records



## Safeguarding Our Assets

### Use of Company Information Technology

#### What does it mean?

Information technology - includes all computer devices including mobile devices, computer networks, computer information management services including cloud computing, system software, application software, mobile phones, removable storage media and emerging technologies.

#### What do we believe?

We aim to provide up to date information technology that promotes collaboration and innovation and enhances our customer's experience.

We believe that everyone should use these assets responsibly.

#### Business use

We always follow all security measures for our information technology assets, this includes using only IT approved software, locking devices when not in use, password protecting removable media devices and never disclosing our passwords to unauthorised persons.

We never use our information technology assets in circumstances that are against the law or good business ethics.

#### Personal use

We will not allow personal use of computer information technology to interfere with our work (*or anyone elses*), or use it in circumstances that are against the law or good business ethics.

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#### Scenario:

**Q:** Kris finds a joke online that he thinks is funny, but he knows it's racist. Kris knows Bill in accounts will find it funny. **Is it OK for Kris to forward it on?**

**A: No it's not OK.** Kris should not hold this on his computer or forward it on to anyone. In addition, Kris should be sure that he is not breaking company policy by accessing inappropriate material from company information technology.

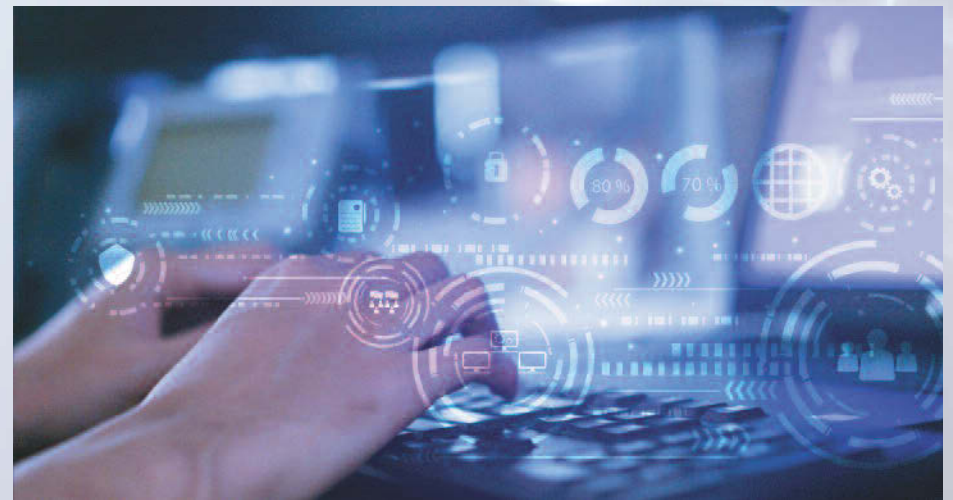
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We shouldn't be using company information technology assets in the following ways:

- For personal gain or that of another person or organisation.
- Accessing, downloading or sending inappropriate, sexually explicit, illegal or offensive material.
- Undertaking any activity that may be contrary to the Thor Anti-Discrimination and Anti-Harassment Policy.
- Downloading or using unlicensed software.
- Downloading of any licensed software without local IT Team supervision.
- Using information technology and/or associated products in non-compliance with applicable licensing, copyright, notices, contracts, agreements, regulations, sanctions or trade control laws.
- Duplicating, publishing or distributing copyrighted materials to which you have no right. This may include (*but is not limited to*), downloading songs, photographs and videos.
- Disclosing confidential information to those not authorised to receive it.
- Using an organisation email address to register on websites that are not connected with the organisation eg: social media, online auction, gambling or similar websites.
- Gambling.

Related Group policies:

- **Thor Information Technology Use Policy**



## Social Media

### What does it mean?

Social media - consists of web-based communication tools such as websites and applications that enable users to create and share information or to participate in social networking.

### What do we believe?

We believe in the right of every individual to use social media for private purposes. At the same time it is important that employees and others associated with the organisation understand the implications of online communication that references the company or something associated with it.

### Business use

We are only allowed to post to social media using a Acti-Chem account if we are authorised to do so. When posting we follow the guidance contained in the Thor Social Media policy.

### Personal use

We never give the impression that our views or opinions are those of Acti-Chem or that we are a company spokesperson speaking on Acti-Chem's behalf. We never disclose Acti confidential information and always remember that what we post can have lasting effects on both ourselves and others.

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### Scenario:

**Q:** Val has been involved in setting up a major new supply contract with a customer that will bring a lot of additional revenue and profit to Acti-Chem. She's excited and posts the news to her personal Facebook account. **Should she have done that?**

**A:** **No.** Val is right to be excited and can post her feelings to her personal account. However, she is not authorised to release confidential business information concerning the company.

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Even posts that we intended to be restricted to family and friends may end up forwarded - sometimes globally. These posts can then be read by anyone including fellow employees, management, customers, suppliers, regulators etc.

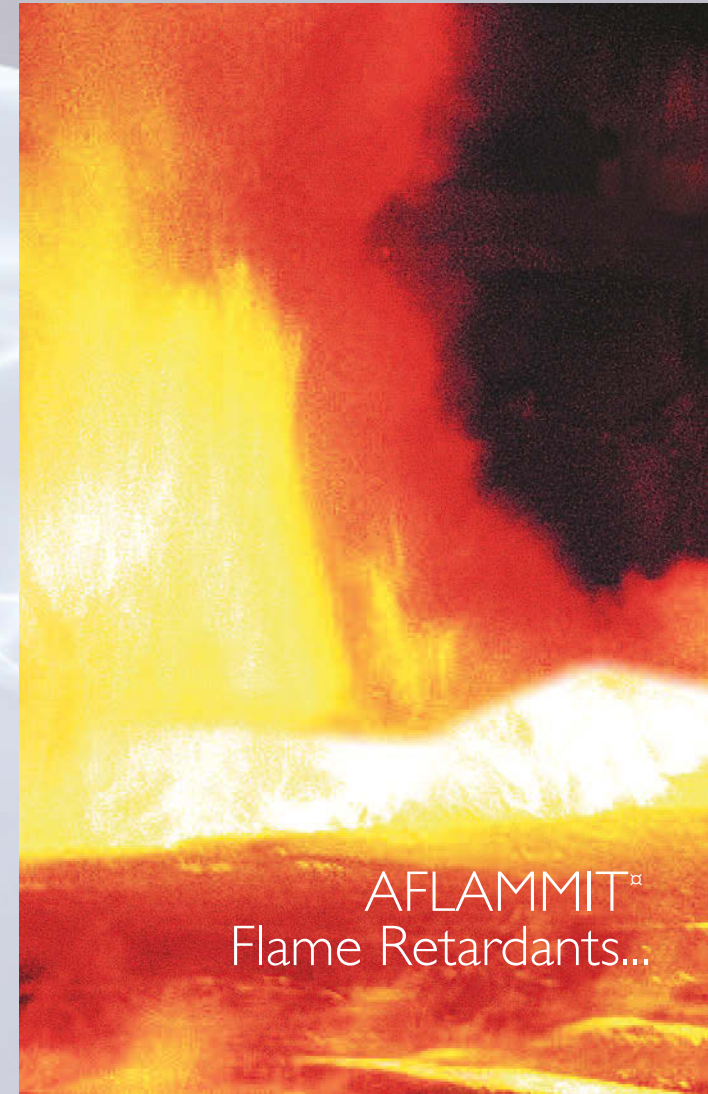
*When using social media for private purposes, we should:*

- Adhere to the Code of Conduct and all other company policies.
- Make it clear that any comment we make is ours alone, using 'these are my personal views' could be helpful.
- Never post non-public company information or non-public information relating to other employees, customers, suppliers, or anyone or anything connected with the organisation.

A good rule is - If in any doubt **do not post**.

Related Group policies:

- **Thor Social Media Policy**
- **Thor Information Technology Use Policy**



AFLAMMIT<sup>®</sup>  
Flame Retardants...



## External Communications

### What does it mean?

We are often contacted for information or comment from external parties such as regulatory agencies, media organisations or even individuals.

### What do we believe?

We believe in giving consistent, accurate information when it is in our business interest or legally required. Incorrect information or confidential information shared at the wrong time or to the wrong outlet can have serious implications for the company.

### What are my responsibilities?

We do not disclose confidential business information, give comments to the media about any aspect of the company or provide information to any other external parties unless we are authorised to do so. Authorisation can only be given by respective Managing Directors or other senior board members.

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#### Scenario:

**Q:** Jay works in the gatehouse and was involved in dealing with an incident on site yesterday where some emergency responders attended. Today a reporter has turned up at the gatehouse and is asking him questions about what happened. Jay was on the spot yesterday and thinks he is the best person to give the reporter the information. **Is Jay right?**

**A: No.** Unless you are authorised to speak on behalf of the company, you should not. Jay should take the reporter's details and inform them that he will pass them on to the correct person; in this case the Site Manager.

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## Confidential Information

### What does it mean?

We have large amounts of confidential information which can come in many different modes. Confidential information can include; patents, copyrights, trade secrets, engineering plans, business ideas, business plans, customer/supplier lists. All of these include information we own and information that may be supplied to us by customers and other business partners.

### What do we believe?

We believe that confidential information should remain confidential. When you protect our confidential information, you protect our assets and our competitive advantage.

### What are my responsibilities?

We do not disclose confidential information unless authorised. We take care of confidential information and are careful where we discuss it, disclose it or access it.

### Scenario:

- Q:** Jackie is the sales manager for one of our large accounts. She is at the airport and receives a telephone call on her mobile from Group Finance who want immediate information for the CEO on sales forecasts. She is sitting in a busy airport boarding area and can't get to a quiet area. **What should she do?**
- A:** Regardless of where Jackie is she must first ensure that the person she is speaking to is someone who is authorised to receive this confidential information. She should then let them know that she is not in a position to discuss it at the moment due to the potential of being overheard. She should not discuss this confidential information if she is not sure that it is safe to do so without it being compromised.



## Data Privacy

### What does it mean?

We often have access to personal information that could identify an individual. This may include their name, address, telephone number, email address or other personal data. There are data privacy laws and regulations that govern how this information may be collected, used, shared, stored and disposed of.

### What do we believe?

We believe that we should always aim to collect and process personal data in accordance with applicable laws, regulations and best practice. Managing personal data responsibly is fundamental in maintaining trust.

### What are my responsibilities?

We only collect, access, use or disclose personal data for appropriate business purposes if we are authorised to do so. When we collect personal data we only collect what is necessary.

We do not share personal data with anyone who is not authorised to receive it. In addition, we do not access personal data unless we are authorised to and have a business reason to do so.

### At all times we safeguard personal data.

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#### Scenario:

**Q:** Helen works in HR and has been asked by a supplier for the personal address of one of the buyers so they can send them a birthday card. Helen has said she can't do that. **Is Helen right?**

**A: Yes.** Helen is correct. Providing this information would be a violation of data privacy rules and our policy of keeping personal data private.

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### When we deal with personal data we must always:

- Inform individuals that we want to collect and use their data. Always be transparent as to what we will collect and what we will use it for and never collect what we do not require.
- Ensure that all data held is correct and up to date.
- Access personal data only if we are authorised to do so.
- Never share data with others unless we are authorised to do so and they are authorised to receive it.
- Keep personal data safe and secure. Any data we release to third parties must be covered by the same standards contained within our Code of Conduct.
- Ensure that the transfer of data meets the legal requirements of the country where it is being handled. Inter country transfer must meet the legal requirements of both the country it is leaving and the country where it is being sent.
- Meet the legal requirements for retention of data and only keep data for the purpose for which it was intended and for as long as it is required. Data should always be disposed of correctly.
- Meet the requirements of personal requests for access to data that is held on an individual in the timescales as set by local legal requirements.
- Report breaches of data privacy rules contained within the Code of Conduct or other requirements to our local HR Management immediately.

### Related Group policies:

- **Thor Information Technology Use Policy**

**Use this section for any notes or questions you may have...**

## OUR VALUES

### TRUST

We work as a team

### HONESTY

We deliver on our promises

### OPTIMISM

We believe in our future

### RESPECT

We treat everyone with dignity and respect

