

Benoil Services Limited

Code of Conduct Policy

1. INTRODUCTION

- 1.1 At Benoil Services Limited (the “Company”), we are committed to maintaining the highest ethical standards in our operations. This Code of Conduct outlines our core ethical principles and expectations for all employees, directors, and associated parties. Adherence to this policy is essential to uphold our reputation and ensure compliance with legal and regulatory obligations.
- 1.2 This Code of Conduct policy is designed to guide our employees in their daily decisions and actions, reinforcing our commitment to ethical business practices.

2. ETHICAL PRINCIPLES

- 2.1 Integrity and Honesty: Employees must act with integrity and honesty in all business dealings. Misrepresentation or dishonesty is strictly prohibited.
- 2.2 Transparency: Communicate openly and transparently with colleagues, clients, and stakeholders.
- 2.3 Compliance with Laws and Regulations: All employees must comply with applicable laws, regulations, and company policies, including the Bribery Act 2010.
- 2.4 Reporting Violations: Employees are encouraged to report any suspected violations of laws or company policies in accordance with the Whistleblowing Policy.
- 2.5 Respect and Fairness: Treat all colleagues, clients, and stakeholders with respect and fairness, regardless of their background, identity, or beliefs.
- 2.6 Harassment-Free Environment: The Company is committed to providing a workplace free from harassment, discrimination, and bullying.
- 2.7 Professionalism: Strive for excellence in all professional activities and maintain high standards of work quality.
- 2.8 Confidentiality: Safeguard confidential information and respect the privacy of colleagues and clients.

3. ANTI-BRIBERY AND CORRUPTION

- 3.1 The Company operates a zero-tolerance approach to bribery and corruption. Employees must not offer, accept, or solicit bribes in any form.

- 3.2 Facilitation payments are considered bribes and are strictly prohibited, except in life-threatening situations, which must be reported immediately to management.

4. GIFTS AND HOSPITALITY

- 4.1 Gifts and Hospitality Guidelines: Employees must adhere to the Gifts and Hospitality Policy, ensuring that any gifts or hospitality offered or received do not influence, or appear to influence, business decisions.
- 4.2 Disclosure Requirements: Any gift or hospitality valued over £100 must be disclosed to the Managing Director, who will maintain a Gifts & Hospitality register.

5. CONFLICTS OF INTEREST

- 5.1 Avoiding Conflicts: Employees must avoid situations where personal interests conflict with the interests of the Company. Any potential conflicts must be disclosed to management.
- 5.2 Outside Engagements: Employees must not engage in outside business activities that may detract from their responsibilities, or create a conflict of interest, without prior approval.

6. REPORTING AND ACCOUNTABILITY

- 6.1 Responsibility for Compliance: All employees are responsible for understanding and complying with this Code of Conduct.
- 6.2 Consequences of Violations: Breaches of this policy may result in disciplinary action, including termination of employment.

7. CONCLUSION

- 7.1 The Company is dedicated to fostering a culture of integrity and ethical behaviour. By adhering to this Code of Conduct, we can ensure a positive work environment and maintain the trust of our clients and stakeholders.

8. RESPONSIBILITY FOR COMPLIANCE AND SCOPE OF POLICY

- 8.1 This policy is part of our suite of Ethical Business Practices policies and has been approved by the Board.

This policy has been approved & authorised by:

Name: Matt Anstead

Position: Managing Director

Date: 5th December 2025

Signature:

A handwritten signature in dark ink, appearing to read 'MA Anstead', is written over a light blue horizontal line.