



CODE OF ETHICAL STANDARDS - POLICY STATEMENT

Purpose

This policy has been created to provide a framework and guidance on the company's approach to achieving and maintaining good business behaviour using sound ethical conduct. It serves to ensure that all employees are aware of their individual and collective responsibilities with regards to the company's ethics, and to emphasise our employees, suppliers, and customers' expectations to being treated fairly and by good business practices.

All employees are responsible for reading this document in its entirety and for ensuring that they comply with all the policy requirements as stated within this document. The purpose of this ethics policy is to maintain a culture of openness, trust and integrity in the company's business practices. Effective ethics is a 'team effort' involving the participation and support of every TMS Analysis Ltd employee. TMS Analysis Ltd is committed to protecting employees, business partners and suppliers from illegal or damaging actions by individuals, either knowingly, or unknowingly.

Equality, Diversity and Inclusion

TMS Analysis Ltd understands that everyone is different and have unique qualities to offer. We seek to respect and understand these differences, so we can make the most of everyone's talents, to the benefit of individuals and the business as a whole. To this end, TMS Analysis Ltd is committed to the promotion of equal opportunities throughout its business.

Defining Equality, Diversity and Inclusion

TMS Analysis Ltd believes that Equality is about creating fairness, where everyone can participate and has the same opportunity to fulfil their potential. We are committed to fully complying with our obligations under the Equality Act (2010) by preventing unfair discrimination, harassment and victimisation; advancing equality of opportunity and fostering good relations between people with a protected characteristic and those with none.

TMS Analysis Ltd recognises that Diversity acknowledges and values the full range of differences between people both in the workplace and in wider society.

Diversity acknowledges that entry into the workplace and an individual realising their potential once there, can be influenced by a range of factors beyond the characteristics included within equality legislation. These include social, economic and educational background, professional background, hierarchical level, working style, nationality etc.

TMS Analysis Ltd understands that Inclusion relates to an individual's experience within both the workplace and in wider society, and the extent to which they feel valued and included.

Social and Economic Benefits

TMS Analysis Ltd believes that fully valuing Equality, Diversity and Inclusion benefits our business in the following ways:

- 1) We can engage with and better understand the diversity of our stakeholders and customers, and can build on the experiences and insight of our diverse staff to create and maintain opportunities for both individuals and the company;
- 2) We value everyone's contributions, including people from across society, to make a positive difference to innovation, efficiency and performance
- 3) We believe that creating the right culture, will develop a strong reputation, which will improve our ability to attract and retain the best talent and maintain positive relationships with all stakeholders
- 4) TMS Analysis Ltd is committed to a zero-tolerance policy concerning discrimination based on any protected characteristic both internally as an organisation or with any organisation it works with externally.

Code of Conduct

Forced or Involuntary Labour

Workers shall not be subject to any form of forced, compulsory, bonded, indentured, or prison labour. All work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

Recruitment Fees

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

Contracts of Employment

Written contracts of employment shall be provided to migrant workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

Document Retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation (e.g. passports), is strictly prohibited. The retention of personal documents shall not be used as a means to bind workers to employment or to restrict their freedom of movement.

Deposits

Migrant workers shall not be required to lodge deposits or security payments at any time.

Humane Treatment

The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour.

Workplace Equality

All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work (including but not limited to wages, benefits, and accommodations) no less favourable than those available to country nationals. Migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

Wages and Benefits

All workers shall be paid at least the minimum wage required by applicable laws, and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, following national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorised by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers. Clear and transparent information shall be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain complete control over their earnings. Wage deductions must not be used as a disciplinary measure, or to keep workers tied to the employer or their jobs. Workers shall not be held in debt bondage or forced to work to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

Working Hours

Workers shall not be forced to work more than the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary, unless part of a legally recognised collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

Freedom of Movement and Personal Freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer or recruiter-operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

Grievance Procedures

An effective grievance procedure shall be established to ensure that any migrant worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

Private Employment Agencies and Labour Recruiters

Companies should hire migrant workers directly whenever possible. When the sub-contracting of recruitment and hiring is necessary, companies shall ensure that the

labour agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

We encourage anyone (including employees, sub-contractors, suppliers and clients) to report in good faith any issues or concerns about potential ethics, human rights, legal or regulatory violations, including improper or unethical business practices such as fraud or bribery.

Responsibilities and reporting procedure

It is the contractual duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption. You must immediately disclose to TMS Analysis Ltd any knowledge or suspicion you may have that you, or any other employee or associated person, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe in connection with the business of . For the avoidance of doubt, this includes reporting your wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the directors of TMS Analysis Ltd but equally to all employees and associated persons.

TMS Analysis Ltd encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken expeditiously. If you wish to report an instance or suspected instances of bribery, you should speak directly to one of the Directors. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. TMS Analysis Ltd is committed to taking appropriate action against bribery and corruption. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

TMS Analysis Ltd will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. It is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

Record Keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

Sanctions for breach

A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with as per TMS Analysis Ltd disciplinary procedure. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal. As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

Monitoring Compliance

TMS Analysis Ltd's Directors have lead responsibility for ensuring compliance with this Policy and will review its contents regularly and have overall responsibility for ensuring this Policy complies with TMS Analysis Ltd's legal and ethical obligations.

This policy will be held by the Directors on behalf of TMS Analysis Ltd and will be reviewed annually to ensure that it remains relevant, both internally with all employees and externally regarding changing social and moral attitudes and business best practice.

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Director

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