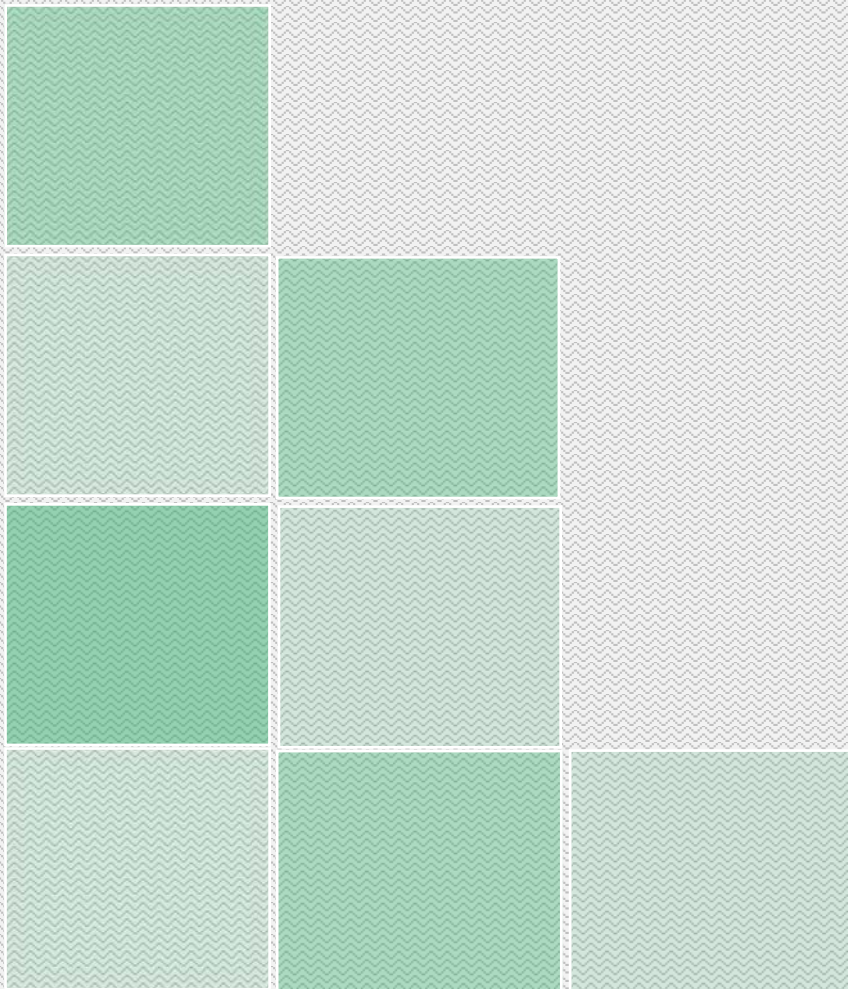




**OMNIA**



# OMNIA'S OVERARCHING POLICY STATEMENT



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**Version 1:**

13 November 2019

**Revision frequency:**

2 years (next required revision November 2021)

**Document owner:**

Omnia Group: GE Safety, Sustainability and Risk

**Document controller:**

Omnia Group: Systems and Internal Controls Manager

**Document reviewer:**

Policy Steering Committee

**Document approver:**

Omnia Executive Committee



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## 1. Standard of conduct

Omnia Holdings Limited and its subsidiaries ('Omnia') is committed to conducting business with honesty, integrity, fairness, respect for the human rights and interests of all employees and in a legally compliant manner. Similarly, the legitimate interests of those with whom Omnia has relationships will be respected. In pursuit of this objective, Omnia will be guided by the Principles contained in the United Nations Global Compact.

### **The way Omnia conducts business is further underpinned by the Group's Core Beliefs:**

1. Proudly building on our heritage
2. Creating a safe and sustainable world
3. Leading with integrity, trust and respect
4. Caring for, supporting, and empowering our people
5. Passionate and engaged people
6. Embracing diversity
7. Pioneering, learning and innovating
8. Adding value to our customers and stakeholders
9. Working and growing together
10. Better starts with me

## 2. Obeying the law (Core beliefs 2 & 3)

Omnia and its employees are required to comply with the laws and regulations of the countries in which it operates.

## 3. Employees (Core beliefs 2, 4, 5 & 6)

Omnia is committed to a working environment that promotes diversity and equal opportunity; that has mutual trust, respect for human rights and is non-discriminatory. Recruitment, employment and promotion of employees will be undertaken based on the qualifications and abilities needed for the work to be performed. Safe and healthy working conditions for all employees will always be a primary focus. Employees will be provided with a total remuneration package that meets or exceeds the legal minimum standards or appropriate prevailing industry standards. No form of forced, compulsory, trafficked or child labour will ever be used. Omnia will work collaboratively with employees to develop and enhance skills and capabilities. The dignity of the individual and the right of employees to freedom of association and collective bargaining will be respected. Communications with employees will be maintained through company-based information and consultation procedures. Transparent, fair and confidential procedures when employees raise concerns will be ensured.



#### **4. Customers (Core beliefs 2, 4, 5 & 6)**

Omnia is committed to providing products and services which consistently offer value in terms of price and quality, and which are safe for their intended use. Products and services will be accurately and properly labelled, advertised and communicated.

#### **5. Shareholders (Core belief 8)**

Omnia will conduct its operations in accordance with internationally accepted principles of good corporate governance. Timely, regular and reliable information on Omnia activities, structure, financial situation and performance will be provided to all shareholders.

#### **6. Business partners (Core belief 8)**

Omnia is committed to establishing mutually beneficial relations with suppliers, customers and business partners. In all business dealings, partners will be expected to adhere to business principles consistent with those of Omnia.

#### **7. Community involvement (Core beliefs 1 & 8)**

Omnia strives to be a trusted corporate citizen and, as an integral part of society, to fulfil responsibilities to the societies and communities in which it operates.

#### **8. Public activities (Core beliefs 2 & 3)**

Omnia entities are encouraged to promote and defend their legitimate business interests. Omnia will cooperate with governments and other organisations, both directly and through bodies such as industry associations, in the development of proposed legislation and other regulations which may affect legitimate business interests. Omnia neither supports political parties nor contributes to the funds of groups whose activities are calculated to promote party interests.

#### **9. The environment (Core belief 2)**

Omnia is committed to making continuous improvements in the management of environmental impact and to the longer-term goal of developing a sustainable business. Omnia will work in partnership with others to promote environmental care, increase understanding of environmental issues and disseminate good practice.



## **10. Risk management (Core belief 2)**

Omnia recognises that taking business decisions which entail calculated risks and managing those within sensible tolerances is fundamental to delivering long term value to shareholders and meeting commitments to employees, customers, contractors, suppliers and members of the communities in which business is conducted. Risk management must be integrated into the day to day management and operation of the business. It should guide decision making and form an integral part of Omnia's culture. Omnia's risk management strategies are guided by applicable international standards.

## **11. Innovation (Core belief 7)**

Omnia will respect the concerns of consumers and of society in all research and development initiatives to meet consumer needs. Such initiatives will be based on sound science, applying rigorous standards of product safety.

## **12. Competition (Core belief 3)**

Omnia believes in vigorous yet fair competition and supports the development of appropriate competition laws. Omnia Group divisions and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

## **13. Bribery and corruption (Core belief 3)**

Omnia does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe. Any demand for, or offer of, a bribe must be rejected immediately and reported to management. Omnia accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

## **14. Conflicts of interest (Core belief 3)**

All permanent and non-permanent employees working for Omnia are expected to avoid personal activities and financial interests which could conflict with their responsibilities to the company. Employees must not seek gain for themselves or others through misuse of their positions.

## **15. Compliance-monitoring-reporting (Core beliefs 2, 8, 9 & 10)**

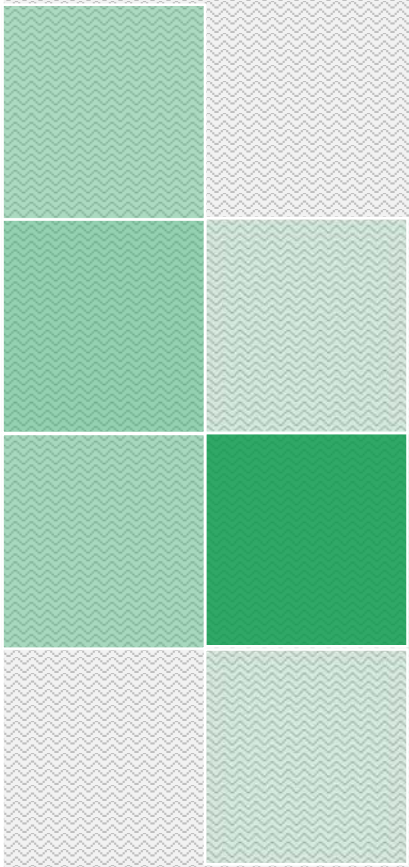
Compliance with these principles is an essential element in the success of Omnia's business. The Omnia Board is responsible for ensuring these principles are applied throughout Omnia.



The Omnia Chief Executive Officer is responsible for implementing these principles and is supported in this by the Omnia Policy Steering Committee. Day-to-day responsibility is delegated to all senior management of divisions, categories, functions and operating companies. They are responsible for implementing these principles. Assurance of compliance is given and monitored each year. Compliance is subject to review by the Board of Directors supported by the Social, Ethics and Risk Committee and the Audit Committee.

Any breaches of the Code must be reported. Provision has been made for employees to report breaches in confidence and no employee will suffer retaliation as a consequence of doing so. Breaches will be treated as a misconduct and dealt with in line with the Disciplinary Code as applicable.

In recognition of the need to conduct the affairs of Omnia according to the highest standards of corporate governance and in the interests of investor protection, Omnia's commitment to good governance is formalised in charters, policies codes and operating procedures. These are intended to cover all aspects of the organisation's activities wherever situated, and in reporting internally and to stakeholders. The board is committed to achieving high standards of corporate governance, business integrity and ethics across all its activities.



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