

The Ethics Policy of HT Brigham & Co Ltd is as follows:

This policy has been created to provide a framework and guidance on the company's approach to achieving and maintaining good business behaviour by means of 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' and customers' expectations to being treated fairly and in accordance with 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 employee.

The company is committed to protecting employees, business partners and suppliers from illegal or damaging actions by individuals, either knowingly, or unknowingly. When Brigham addresses issues proactively and uses correct judgement, it will help to set the company apart from its competitors and help further enhance its reputation.

The company will not tolerate any wrongdoing or impropriety at any time. The company will take the appropriate measures and act quickly where the 'ethical code' is broken.

SCOPE

This policy applies to all employees, contractors, consultants and part time employees of Brigham.

POLICY

Leadership commitment to Ethics:

- that Integrity is one of the company's core values
- to set and lead by example – in any business practice, honesty and integrity are of the highest importance
- to have an open-door policy and welcome suggestions and concerns from all employees.

This creates an environment that will allow employees to feel comfortable discussing any issues and will serve to alert Directors to concerns within the company.

Employee's commitment to Ethics:

- to disclose any conflicts of interests regarding their position with the company
- to engage in carrying out the company's mission in a professional manner and in line with
- the core values of the company which includes integrity
- to recognise that the main function of the company is always to serve the best interests of its current and future customers, and to do this with respect, concern, courtesy, and responsiveness
- to treat everyone fairly, have mutual respect, promote a team environment, and avoid the intent and appearance of unethical or compromising practices
- to treat all persons with respect and consideration, regardless of race, religion, gender, sexual orientation, maternity, marital or family status, disability, age or national origin
- to respect the structure and responsibilities of management, provide them with facts and advice as a basis for decision and policy making, and uphold and implement decisions and policies adopted by management
- to demonstrate the highest standards of personal integrity, truthfulness, and honesty in all activities to inspire confidence and trust in such activities, both internally and externally
- to strive for personal and professional excellence, encourage the professional development of others and keep up to date on emerging issues affecting the Company
- to conduct themselves always with professional competence, fairness and impartiality Company's commitment to Ethics
- to hold paramount the safety, health, and welfare of the public in the performance of the company's professional duties
- to keep the local communities informed about issues which may affect them

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- to collaborate with and support partners in carrying out the company's mission and in line with the company's ethics policy
 - to build professional reputations on the merit of our capabilities and refrain from competing unfairly with others
 - not to engage in any business practice or process or with any entity, including potential customers, that does not match the Company's ethical standards

GOVERNANCE AND REVIEW

Should an employee be in any doubt about a relevant course of action, require clarification on an issue, or want to report a potential breach of the ethical code, they should report directly to the CEO. The topic/issue will then be dealt with as quickly and efficiently as possible.

This policy will be reviewed to ensure that it remains relevant, both internally with all employees and externally regarding changing social and moral attitudes and business best practice

Signed:



Chief Executive

Released: 30th May 2022

Reviewed: 27th May 2025