

Document	Creator	Rev	Document Reference
PMAR Ethics Policy	SHM	1	9.6.1

Pragmatic Maintenance & Reliability Ltd.

1. Code of Ethics

Pragmatic Maintenance and Reliability Ltd. (Pragmatic) provides predictive maintenance services to a number of different industries.

Pragmatic will conduct its business ethically and honestly, wherever we operate. We strive to continually improve the quality of our services and to build a reputation for fairness, honesty and respect in all areas of our business. Pragmatic, its directors and employees, will not compromise these principles for any gain.

Pragmatic's officers and employees will never allow personal gain to conflict or appear to conflict with the interests of the company or those of its clients or associates. They will never represent or seek to represent Pragmatic for their personal gain.

2. Bribes, Gifts and Inducements

No bribes, gratuities, gifts or inducements of any kind will be given to any person or organisation to attract or influence their decisions in any way. Officers and employees will avoid gifts, gratuities, excessive entertainment or fees to influence or attract business activity.

However, gifts, gratuities or entertainment may be given, where there is no intent to induce or influence a person or organisation in their decisions. Such gifts, gratuities or entertainment should be of a limited value or be directed to charitable causes (for instance, sponsoring prizes in a charity draw). For further details on the above, please, consult the Gift and Hospitality Policy document (ref. 9.6.3).

3. Confidential Information

Where the officers or employees of Pragmatic come into contact with confidential or sensitive client (or associate) documents, they will act appropriately, in order to maintain full confidentiality, and will never use this information for personal gain. Confidential or proprietary information about clients, associates or individuals will be treated with sensitivity and will only be disseminated on a need-to-know basis. As far as the confidential information is concerned:

- We will never share personal details, addresses, clients' site details or any other sensitive material with third parties, except with specific consent, or where we are required to do so by legal authorities.
- Where clients require us to enter into confidentiality agreements, internal dissemination of information identified as being confidential, it will be controlled on a need-to-know basis. Electronic and physical confidential documents will not be stored in folders / locations, which are available to all staff.

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- Confidential information is to be used for the intended purpose only.
- Confidential documents are to be returned, or securely destroyed, when it is no longer required.

4. Insider Trading

Misuse of inside information in connection with trading in securities; insider trading can lead to legal proceedings and will result in disciplinary action within Pragmatic. Officers and employees will not trade in securities, where they have such proprietary information, unless / until that information has been made already public.

5. Behaviour Towards Competitors

Pragmatic staff will avoid gathering information on competitors using illegitimate means. They will also avoid exaggerated or disparaging comparisons with competitors.

6. Equal Opportunities

Pragmatic, its directors and employees will respect and obey equal opportunities law. Moreover, we are committed to positively valuing and developing all our staff equally, regardless of their race, age, gender, religion, sexual orientation or any other personal characteristics. Further details are available in the Equal Opportunities Policy document (ref. 9.6.2).

7. Reporting

Officers and employees of Pragmatic upon becoming aware of a breach of this code must report this to senior management as quickly as practically possible.



Andrew Mellor, Director



Sue Mellor, Director