

**GROUP
CODE OF CONDUCT**

2022

Megger Group Code of Conduct - Contents

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Introduction from our Chief Executive

Megger has been a leader in electrical test and measurement globally for 130 years. From power generation to the power outlets in your home, Megger products cover almost every application within the Electrical Supply Industry.

Our products are categorised into seven core application segments: cable test and diagnostics, protection relays and systems, circuit breakers, transformer test and diagnostics, low voltage installations, general electrical testing, and motor and generator testing. The Group also has a developing Grid Solutions business, including Partial Discharge and Grid Analytics, together with an investment in a software business specialising in Asset Performance Management solutions.

We have manufacturing sites in various locations within Germany, USA, UK, and Sweden, with our headquarters based in Dover, UK, and sales offices across the globe. Megger has grown substantially through acquisitions, including Biddle Instruments (1936, Pennsylvania), Multi-Amp (1951, New Jersey), Programma (2007, Sweden), SebaKMT (2012, Germany), Baker Instruments (2018, Fort Collins), Power Diagnostix (2019, Aachen) and most recently Metrycom (2021, Herzliya Israel), together with a strategic share in IPS Intelligent Process Solutions (2021, Pullach Germany).

At the heart of our success has been an ethos of honesty and integrity, which are the core values of Megger Group's Code of Conduct. The way in which we deal with each other, and our external partners, not only defines the Megger Group brand across the globe, but develops standards which enable the Group to grow further.

In many instances, high standards of business integrity are common sense, but every Group employee and external partner is ultimately responsible for their actions, which reflect on the Group as a whole. If these standards are not met, the Group would be exposed to loss of reputation and future business, or for offending individuals, fines and/or imprisonment.

Every relevant employee and business partner (defined overleaf) is to be provided with a copy of this Code and we expect them to safeguard its standards. Megger Group senior management are responsible for a communication plan, along with relevant training on a periodic basis, in which we expect applicable staff to participate.

If you are aware of any breaches of this Code, you have a responsibility to report it confidentially to the Group's Chief Compliance Officer, whose contact details can be found at the end of the Code. I would like to stress the importance of consultation if you are in any doubt or have any concerns.

The reputation and future of Megger Group is in our own hands, I hope this Code allows us to continue to grow and build a bigger and more successful group in the future.

Jim Fairbairn
Chief Executive

Background to the Code of Conduct

This Code of Conduct (“Code”) sets out the ethical principles by which all businesses and employees of Megger Group (“the Group”) are expected to operate worldwide. Compliance with the Code helps to sustain and enhance our reputation and provides a strong message of integrity to all of our stakeholders.

There are a number of parties who are specifically subject to the Code:

- All employees, but especially those who interact with third parties (referred to as “Relevant Employees”).
- All individual reporting entities within the Group, which might be a legal entity, profit centre, sales office or site, depending on the divisional structure (and referred to as a “Business Unit”).
- All agents, contractors, distributors, associates and joint venture partners with whom we do business in Megger Group (who we refer to as “Business Partners”).

Our major customers and suppliers (who we refer to as “Trading Partners”) rely upon Megger’s reputation for honesty, integrity and quality. As such, we will also provide this Code to all customers and suppliers with an annual transaction value in excess of €1m.

We must take the greatest care in how we deal with the employees of governmental, state-owned and other public organisations, who we refer to as “Public Officials”. There is stringent legislation referred to in the “Preventing corruption” section that discusses this further.

The Board has nominated Jeremy Simpson as Chief Compliance Officer, to monitor compliance with the Code. Further, to assist in implementing, communicating and administering the Code, a group of “Senior Managers” has been identified. These individuals comprise the senior operational leadership of the Group, who can be found on the Megger Group Website at <https://uk.megger.com/company/about-us/who-we-are/leadership-team>.

Senior Managers must lead by example and give those who report to them the necessary resources and support to understand and follow this Code’s requirements. The Code is nevertheless no substitute for accepting individual responsibility and we must each exercise sound judgment and common sense in our actions and dealings with others and if in doubt, seek advice as necessary.

Core Principles of the Code

Every employee and Business Partner has a critical part to play in ensuring the Code becomes part of the fabric of our organisation – “doing business the right way” is not about compliance, but culture. No employee or Business Partner should be afraid to express their concerns about perceived unethical behaviour and consultation is critical, even when they are unsure as to its importance or materiality. In adopting the Code, encapsulated in the following Core Principles, we can work together to deliver growth and prosperity to the Group.

Our ethos of honesty and integrity is a responsibility we carry as a Group to all our stakeholders and our commitment includes the following:

CARING

As a multinational family, we are culturally aware, and socially rich. Our respect and consideration for each other makes collaboration easy and this is evident in the quality of our work.

CREATIVE

Pioneering is in our DNA. As innovators, we encourage change and the positive influence this brings to the lives of our workforce, our customers, their communities and the wider environment.

CONSISTENT

Our intellectually powerful, problem-solving mindset and uncompromising attitude to safety, make us predictably reliable.

CAPTIVATING

When we take the initiative, lead by example and amplify our individual sense of fun, we are inspirational to those around us. When we are transparent, humble and supportive, we gain their admiration and trust.

CONFIDENT

The Megger brand is a global badge of technical excellence and customer reassurance because our people are strong, resilient and focused.

Megger Group will always operate within the legal and moral framework of the countries within which it is located and within which it trades.

Consequently, Megger expects that all employees will maintain the highest professional standards in their dealings with third parties and with other Megger employees and will ensure adherence to legal requirements, rules, procedures and proper practices.

Individual Megger sites will have their own written policies and procedures in place to implement this Group Code of Conduct in their Business Unit in accordance with local requirements / best practice. These documents will be included in the induction programmes of all new employees with commercial and managerial responsibilities.

A: Preventing corruption

The way we deal with Business Partners, Trading Partners and Public Officials in all our countries of operation will direct our business growth as a Group in the long term. The ethos of Megger Group is about acting in a transparent and fair manner, which includes neither offering nor accepting bribes or inducements, nor having involvement in any corrupt business dealings and practices. Attempting to improperly influence a person, Public Official or business outcome is also unacceptable.

Bribery and corruption

Most countries have laws that prohibit bribery and corruption and there is international pressure for a strengthening of these laws across the globe. In particular, many countries now have laws that extend beyond their borders, meaning an offence committed in an overseas territory can be prosecuted by the authorities in an individual's or their employer's home territory. Business Units should seek to avoid trading in those jurisdictions that do not have bribery and corruption regulations and consult the Chief Compliance Officer where this is unavoidable.

Megger Group prohibits any employee or Business Partner from making or offering any payment or other form of inducement to any person in order to attempt to influence them to perform their duties improperly or secure an improper commercial advantage for our business, or receive similar forms of inducement for doing the same. We cannot do business with any Trading Partner who does not adhere to the same high standards. The ethos of Megger Group is about acting in a transparent and fair manner, which extends to all third parties through whom we do business – we cannot seek to avoid responsibility by asking others to act improperly on our behalf.

We must be especially careful in our dealings with Public Officials, who operate under stringent rules, a breach of which could result in severe consequences for Megger Group and the offending employee or Business Partner.

Relevant Employees and Business Partners will periodically be asked to undertake bribery and corruption training and be asked to sign an attestation of their understanding of Megger Group's bribery and corruption policies, together with the Code.

When considering Country risk factors of Bribery and Corruption, the following link provides a useful summary for consideration: <https://www.transparency.org/en/cpi>

A copy of the Group's bribery and corruption policy can be found on Megger Connect.

Gifts, entertainment and hospitality

Megger Group's policy is that no gifts should be given or accepted by an employee or Business Partner without prior approval. However, we recognise that where the giving and receiving of modest gifts is part of a cultural norm, that we should not cause offence. As such, non-cash gifts with a nominal value are considered to be sufficiently modest, subject to employees and Business Partners adhering to this Code. Rather than set a specific sum, any gift given or received will require prior approval from a Senior Manager. The giving or receiving of cash or cash-equivalent items is however never acceptable.

Entertainment and hospitality are part of a global corporate culture, where companies seek to build relationships, improve their image and present their goods and services to prospective partners. However, any hospitality given must be reasonable and proportionate and cannot be given to unduly influence a person to perform their role improperly. Any hospitality or entertainment event where the expenditure exceeds (or is likely to exceed) €50 per head must be subject to prior approval by a Senior Manager or their nominee.

Each Megger site will maintain a register of gifts and entertainment, given and received.

Relations with Government

All information provided to government contacts must be transparent, accurate and appropriate for purpose. Where we are in partnership with Public Officials, we must ensure the relationship is in full compliance with local law and any gifts and hospitality are employed purely in the interests of building and maintaining relationships, as opposed to being employed to directly secure a benefit for Megger Group.

Local Approvals

We expect each Business Unit to employ comprehensive local approval limits for all applicable processes, including those contemplated by the Code. A copy of these “Local Approvals” must be supplied annually to compliance@megger.com.

This will reinforce compliance with the Code and ensure the highest ethical standards are maintained.

B: Personal integrity

We must operate with the highest personal standards and ensure that transaction flows are earned through honest competition and endeavour.

Money laundering

Money Laundering is a generic term for hiding the criminal origins of money in a legitimate enterprise, for example using “dirty” money to buy “clean” products and then selling them on for “clean” proceeds.

Money Laundering is a widespread problem that catches numerous legitimate operations and we have a duty to identify suspicious activity, including:

- A transaction where we cannot verify the parties – for instance where a customer requests that payment or a supplier requests remittance be made through an unrelated party.
- Transactions conducted through intermediaries, especially third party payment bureau service providers, who process financial transactions.
- A new customer who is prepared to pay an unusually high price.
- Transactions involving high-risk countries or offshore tax havens.
- Transactions with unfamiliar banks.
- Unusual requests – for example remittance of commissions in a series of small payments (which can often fall under the exchange review threshold in certain countries and be taken offshore) or payments through less traceable means, such as cash.
- High value cash transactions (exceeding €500).

In the event of any concerns, a Senior Manager should be consulted and always in the event of high value cash transactions.

Conflicts of interest

A conflict of interest will arise where personal interests conflict with those of the Group. Situations where there appears to be a conflict of interest should be avoided.

Conflicts of interest may arise through the following:

- Personal shareholdings, directorships and other financial interests.
- A close relative or spouse working in an organisation that does business with or competes with the Group.
- Benefitting from the sale, loan or gift of any business property.
- Failing to give the Group the opportunity to benefit from a legitimate business opportunity.
- Deriving any direct or indirect benefit, such as commissions, from a contract entered into by the Group or a Business Unit.

Employees and Business Partners are required to disclose on appointment, or when the conflict arises, any interest which may affect the Group’s business.

C: National and international trade

Megger Group is committed to behaving with openness, transparency and integrity. This means that we will not act in collusion with our competitors and will be open and honest in our dealings in all markets, even where this is expensive or time consuming.

Compliance with laws and regulations

Megger Group and its Business Units must comply with the laws and regulations of the jurisdictions in which they work. This extends to the intended spirit of the law, rather than relying purely on its written form.

Each Group company must establish and enforce effective compliance procedures, where necessary through taking local advice. Where differences arise between local customs, practices, laws or regulations and this Code, the individual is required to consult the Chief Compliance Officer.

Competition legislation

Competition Law protects free and open trading across the world and applies to all companies. The penalties for breaching Competition Law are severe. Senior Managers are required to be familiar with local competition and anti-trust legislation and communicate this to relevant employees. Such familiarity is critical to ensure that we can avoid inappropriate behaviour within Megger Group and protect our interactions with Business Partners, Trading Partners and competitors. The laws of the UK and US are especially stringent and extend beyond their geographic borders.

There are a number of activities we need to be aware of and avoid:

- Agreements with competitors surrounding:
 - Bids and tenders.
 - Prices.
 - Production levels.
 - Customers and/or suppliers that we will or will not deal with.
 - Markets that we will or will not trade in.
- Discussion of confidential data with competitors, such as the contract pricing or customer lists.
- Misrepresenting a competitor's capabilities.

Megger Group employees often meet competitors at Industry meetings and if concerned about the direction of a conversation, they must either make it clear or walk away. In such cases, employees should report their concerns to the Chief Compliance Officer.

Export controls

Export controls give countries the ability to control the goods and services being supplied across national borders. These can involve physical and electronic transfers and exist to control activities such as Intellectual Property infringement and terrorism. Those that break export laws can be subject to severe penalties and it is important to note that the law may follow the product as well as the sale, meaning if Megger Group sells product to a third party who then exports to a prohibited territory, we could still be responsible.

It is critical therefore, that we know where our products are going and maintain vigilance over breaches of the law. In particular, each Business Unit should seek to investigate whether any Megger Group products are particularly sensitive and identify those countries with whom there are export bans or limitations, or where special export licences are required.

The Group has subscribed to electronic portals to check counterparties, including Worldcheck (<https://worldcheck.refinitiv.com/>), which should be consulted whenever engaging in new business.

Megger Group's Company Secretarial department can provide guidance in the event of any concerns or questions, care of compliance@megger.com.

Import controls

Import controls give countries the ability to control the goods and services entering their jurisdiction and operate in a very similar fashion to Export controls. It is important therefore to consider carefully, the duties that apply on importation and the rules that need to be followed on documentation. A particularly critical consideration is the local coding of products to ensure the appropriate duty rates (or exemptions) are applied. The Group's Head of Tax and Treasury can assist with any questions.

Conduct of trade

Megger Group employees will not distort any financial statements, documents or other records (whether paper, electronic or other format) and will always provide consistent and accurate paperwork to all parties concerned in any transaction.

Megger products will always be designed to conform to the local safety regulations, standards and legal requirements of the countries within which they are sold and any product labelling (e.g. safety standards, quality standards, country of origin, etc.) will be accurate.

D: Doing business the right way

Megger Group's success is driven by its employees and all its external partners. Contracts, agreements and other arrangements with third parties should be transparent, fair and commensurate with the services provided.

Company contracts

All employees must be diligent in selecting and monitoring Business Partners. Megger Group maintains a set of Group policies and procedures, which includes a set of due diligence procedures for use by Business Units to take appropriate steps to confirm that a third party is reputable and has the appropriate skills and qualifications to act. Similarly, we only deal with Trading Partners who we know to be reputable, having made appropriate enquiries.

Business Partners should only be selected in the best interests of the Group and are required to understand the provisions of this Code. Business Partners will periodically be asked to undertake bribery and corruption training and be asked to sign an attestation of their understanding of Megger Group's bribery and corruption policies, together with the Code.

Payments to Business Partners

All payments made to Business Partners must be proportionate to the services they provide and in line with market rates.

Two particularly important arrangements are:

- Consultancy assignments, which are defined as advisory services bought from external parties in the furtherance of Group interests. These would include assignments associated with the securing of orders or contracts.
- Commissions, which are defined as payments for services provided in the furtherance of Group interests and/or the potential securing of business for Group companies. All commissions must be paid in the best interests of the Group and must be commensurate with the circumstances.

All payments made in such circumstances are required to be made in line with a formal written legal agreement, which makes clear the service provided, calculation of the payment and the performance obligations required in order to make a payment.

Donations policy

Megger Group does not make political donations.

Any charitable donations may only be made to a registered charity, which cannot be connected with a Business or Trading Partner.

E: Protecting the Group

The Group relies on the physical protection of its property, plant and equipment, along with its Intellectual Property. To this end, the exchange of information must be made responsibly, with due regard to confidentiality and appropriate records maintained.

External communications

Media enquiries about any Business Unit should be routed to a Senior Manager. No comment should ever be given to the media about TBG or Group matters and all enquiries directed to the Megger Group Chief Executive, Jim Fairbairn.

Records management

All company records must be maintained to a high standard, ready for scrutiny by internal Group functions or external regulators and auditors. Copies of all communications with regard to major contracts should be kept for a period in line with local law, subject to a minimum of seven years.

Company property

Company property must be handled with care to avoid loss, theft or damage and should only be used for business purposes. Employees shall ensure that all Company property is:

- Treated with due care and respect
- Regularly checked and, where appropriate, any damage / concerns with the safety / operation of the item is reported to the local line manager immediately
- Not used if there are any grounds to believe that it is unsafe

Employees shall not use any pieces of highly technical Company property that they have not been appropriately trained and/or qualified to use.

Limited personal use is permitted at the discretion of Senior Management.

Confidentiality

The Group relies on certain information remaining confidential. This information includes, but is not limited to:

- Financial information.
- Corporate information.
- Technical information.

Employees may not disclose any confidential information that has come to their attention during the course of their employment. Employees should at all times protect and maintain the confidentiality of the Group's information and that of its Business and Trading Partners, and may only disclose such information as required by law or as is necessary during the course of their duties with the Group.

This obligation will continue at all times both during and after the termination of employment unless and until the information has come into the public domain. This obligation extends to confidential information held by any Megger Group employee from previous employments.

Intellectual Property

Intellectual Property Rights include copyrights, trademarks, patents, industrial design rights and trade secrets, both in electronic and written form. It is critical that all Intellectual Property held by the Group is kept securely and its confidentiality maintained.

If at any time during the performance of their duties, an employee creates or discovers any Intellectual Property, it shall immediately be disclosed to a Senior Manager to enable necessary protection to be secured.

Third party Intellectual Property Rights shall be respected across all our global operations and improper use of such property is forbidden.

F: Our Environment

Megger Group is committed to the highest standards of quality for all of its products and services and for the safety and protection of its employees. The Group is committed to equality and fair treatment of its entire workforce, which involves mutual respect for each other and to protect our working environment.

Health, safety and the environment

The Group is committed to achieving and maintaining the highest standards of safety for its employees and where relevant, Business Partners, Trading Partners and the public. The Group's goals are to have no accidents, cause no harm to people and have the highest regard for the environment and our footprint.

Each Business Unit must have in place a tailored health and safety programme designed to, at a minimum, comply with local regulatory requirements.

The Group is committed to the protection of the environment by using renewable resources wherever possible, and developing manufacturing processes and procedures, which ensure that adverse effects on the environment are kept to a minimum.

The Group continually looks for opportunities and adopts practices that create a safer and cleaner environment. Environmental concerns must be taken into account in all planning and decision making processes. It is the responsibility of each Business Unit to have in place procedures to encourage the reduction of waste and emissions, and to take into account local environmental issues and the communities in which it operates.

Modern Slavery Act 2015

The Modern Slavery Act 2015 mandates that companies provide a slavery and human trafficking statement to demonstrate and ensure compliance to the Act.

Megger Group is committed to operating all aspects of its supply chain to ethical, environmental, social and safe business best practice. As such Megger requires all vendors supplying the company to operate to the same high standards, noting that vendors shall operate within the rules, laws and regulations applicable to the country of origin.

The supply chain code of conduct used and operated by Megger Group has been developed to detail the expectations from all vendors. This is our minimum standard of practice expected, which includes appropriate due diligence to address the Modern Slavery Act 2015, implementing effective systems and controls to prevent and detect modern slavery. All vendors must be capable of demonstrating their procedures for compliance upon request and during vendor audits which are regularly implemented in high risk countries.

Megger reviews its supply chains and operations on a continuous and ongoing basis to check compliance with the policy, ensuring the policy is implemented effectively.

Further details of the Group's policy can be found at:

<https://uk.megger.com/company/about-us/legal/modern-slavery-act>

Opportunity policy

Megger Group aims to ensure that no job applicant or employee receives less favourable treatment on the grounds of his or her Race, Ethnic Origin, Nationality, Age, Trade Union Activities, Sex, Marital Status, Part-time Status, Sexual Orientation, Religion, Belief or Disability.

This helps to ensure that no applicant or employee is placed at any disadvantage, which is not justifiable under UK Company or local jurisdictional law.

Harassment

The Group's employees come from many countries with different backgrounds and cultures. The Group values the diversity of its employees and respects their right to work in a safe environment of mutual respect, free from harassment and ensuring equal opportunity.

Harassment can take many forms and includes:

- Slurs, insults, name calling and ridicule.
- Offensive or obscene comments, jokes, gestures.
- Bullying, public criticism, undervaluing effort.
- Unwanted physical contact, assaults or threats and intimidation.

Harassment in any form, especially sexual harassment, creates a hostile and abusive work environment and will not be tolerated.

Drugs and alcohol

The Group is committed to ensuring that its employees, and where relevant, its Business and Trading Partners, are provided with a safe working environment. The consumption of alcohol (unless specifically approved by a Senior Manager and then only in moderation) or the use of controlled drugs on Group premises is incompatible with a safe working environment and with the proper performance of duties and as such, is prohibited. Employees must take care not to bring the Group into disrepute when on third party premises and will be subject to disciplinary action if they do.

G: Data protection

Third parties

During the course of Megger's activities it will collect, store and process personal data about current, past and prospective suppliers, customers and others that it communicates with. Megger recognises that the correct and lawful treatment of this data will help maintain confidence and contribute to successful business operations.

All data users must comply with the Megger Group privacy standard and each group company shall provide this to all workers, employers and contractors with the guidelines/notice explaining the scope and extent of Megger's and the individual's obligations.

Each Megger company must take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

Procedures and technologies must be put in place to maintain the security of all personal data from the point of collection to the point of destruction. Personal data may only be transferred to a data processor if it agrees to comply with those procedures and policies, or if it puts in place adequate measures itself. Each Megger company must maintain data security by protecting the confidentiality, integrity and availability of personal data, defined as follows:

- **Confidentiality:** means that only people who are authorised to use the data can access it;
- **Integrity:** means that personal data should be accurate and suitable for the purpose for which it is processed; and
- **Availability:** means that authorised users should be able to access the data if they need it for authorised purposes.

Details of the Group's GDPR policy can be found on Megger Connect or consult the Group Company Secretarial department, which manages data protection policy and training.

Employees

The Group needs to retain information about an employee for purposes connected with their employment and for as long a period as is necessary. The Group may also hold information about an employee's health for the purposes of compliance with health, safety and occupational health obligations.

These uses are consistent with our employment relationship and with the principles of global data protection legislation.

The Group will therefore:

- Comply with legislation impacting protection of personal data and ensure all employees are aware of their responsibilities in that regard.
- Allow all employees to access their personal data on request, subject to any local legislation. The Group will, however, determine reasonable limits when, where and under what supervision access will be granted.

- Release personal data to third parties only if:
 - required to do so by law or court order; or
 - with the written consent of the employee; or
 - required for a valid business reason; or
 - permitted by law.

H: Information Management

Employees who use the internet, email or any IT services provided by Megger Group must do so in a responsible manner, and not put the Group's reputation at risk. Individuals should bear in mind that any transfer of information via these channels can easily fall into the wrong hands. Failure to comply with the Group's IT policies may result in disciplinary action being taken and be regarded, in serious cases, as gross misconduct.

Cyber Security

Cyber Security is an identified key risk for Megger Group. Every employee is required to act with diligence and integrity and observe the Group's data policies. This includes periodic training, under the leadership of the Group's Head of Security.

Email

All email systems and communications made on those systems remain the sole property of the Group and consequently should generally only be used for business related purposes. The Group reserves the right to inspect these systems at any time, subject to compliance with local laws.

Employees must not send, forward, distribute or retain email messages that contain language that is abusive, aggressive or offensive. Occasional personal use of the Group's email systems is permitted. However, messages stored in these systems will be treated in the same manner as business-related messages.

Employees must hold due regard for the Intellectual Property of the Group in all communications and holding proprietary company data for personal use is prohibited.

Internet

Responsible use of the internet is to be encouraged by all Group employees and includes the following guidelines:

- When accessing the internet from Group equipment, employees must ensure that they do not use the service in any way which may bring the Group or individuals into disrepute.
- Employees should remember that although one person does not find material offensive, another might.
- Employees should not directly download and then run executable files. Where there is a genuine business benefit to download information, an employee must receive permission from their local IT department before downloading the information and run a virus check.
- Publication of information about the Group or its employees will require approval from a Senior Manager, which will extend to the use of social networking tools. Potential publishers must comply with the Code in all communications and take care not to compromise the Group.

The downloading of pornography or other offensive material is strictly prohibited.

Software

No software should be loaded onto a computer unless it is for business purposes and has been agreed by the local IT department. All software must have an appropriate licence for use.

I: Consultation

The Code contains a number of policies, rules and procedures, which support and promote the principles of transparency, honesty and openness which define the Group. Every employee and Business Partner is obliged to consult if they have any doubt about actions taken that might infringe this Code.

If you are unsure

Megger Group's success is determined by the behaviour of its employees and Business Partners, but there may be occasions when individuals are unsure of what is right. The following questions should act as a starting point:

- Does this fit with the Group's Code of Conduct ?
- Is this approach legal in the country I am dealing in ?
- Is this approach safe for my colleagues and me ?
- Does this fit with my personal values and instincts ?
- What would our stakeholders think if this matter was to appear in the media ?
- Have I consulted a Senior Manager ?

Contact information

If you become aware of breaches of the Code, Megger Group has arrangements in place for all employees to raise, in confidence, any concerns they may have.

The Board of Megger Group has nominated Jeremy Simpson, as Chief Compliance Officer, who can be reached at:

Telephone: +44 (0)1304 502100
Email: compliance@megger.com

Any employee who fails to report or provide further information about any improprieties will be in breach of the Code and may be subject to disciplinary action. Any employee who reports any possible improprieties can do so with the guarantee of confidentiality.

GROUP CODE OF CONDUCT

VERSION: V2

POLICY OWNER: Group Chief Financial Officer

AUTHORISING DIRECTOR: Jeremy Simpson

ISSUE DATE: 7 April 2022

NEXT REVIEW: 30 November 2022

REVISION & APPROVAL HISTORY

VERSION	DATE	OWNER	APPROVED BY
V1	2020	J Simpson	Megger Group Board
V2	2022	J Simpson	Megger Group Board