

WICKS AND MARTIN LTD CODE OF ETHICS POLICY

Wicks and Martin LTD will conduct its business honestly and ethically. We will constantly improve the quality of our services, products and operations. No illegal or unethical conduct on the part of directors or employees is in the company's best interest.

No bribes, gifts, gratuities, or bonuses shall be given to any person or organisation to attract or influence business activity.

Directors and employees of Wicks and Martin LTD will often be in the possession of confidential or business sensitive information such as operations, customer lists, personnel records, manufacturing costs, processes, methods and must take appropriate steps to ensure they are safeguarded.

The following guidelines should be followed in dealing with inside information:

- 1. Until information has been officially released by the company, an employee must not disclose it to anyone except those in the company whose positions require use of the information.
- 2. Employees must not buy or sell the companies securities when they have knowledge of sensitive material.
- 3. Employees must not buy or sell securities of another business

Directors and employees will report all information accurately and honestly, they will refrain from gathering competitor intelligence by illegitimate means and will refrain from acting on knowledge which has been gathered in such a manner.

Directors and employees shall obey all Equal Opportunity laws and will act with respect and responsibility to others. Their personal life should not interfere with their ability to deliver quality products to a company and its clients.

All agree to disclose unethical, dishonest, fraudulent, or illegal behaviour directly to management, any violation can result in discipline which could result in termination of employment.

Good ethics is good business

Signed:

GENERAL MANAGER

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