

## Code of Ethics and CSR Policy 2023

### **Code of ethics:**

The principles of integrity, honesty and respect for people are at the core of RAM's operations, and our reputation is founded on these. The trust and confidence of those we deal with and the communities in which we operate are critical to the continued growth and success of RAM.

We recognise that legal and cultural standards vary across the world, but this code defines the minimum acceptable conduct for RAM suppliers and partners while engaged in any RAM-related business, for example, business activities with RAM and/or products supplied to RAM.

### **Business ethics and integrity:**

RAM is devoted to conducting business in an ethical, legal, and socially responsible manner. To help ensure that our suppliers and partners share this commitment to integrity in all business dealings, all of RAM's suppliers should adhere to our code of conduct. To that end we subscribe to the following core principles:

#### **Anti-bribery, corruption, and fraud**

No employee may directly or indirectly offer, pay, solicit, or accept a bribe, or other such payment which may be construed as such, in any form. No employee should seek or accept a personal gift or entertainment that might reasonably be believed to influence commercial activity or the decision-making process.

All business transactions should be reflected accurately and fairly in RAM's accounts in accordance with established procedures and be subject to audit.

#### **Honesty**

We will not say things that are false or deliberately mislead, sharing information freely and openly, as appropriate to the relationship.

#### **Promise keeping**

We will go to great lengths to keep our commitments. Individuals or agents of the company will not make promises that they cannot keep.

#### **Fairness**

We will endeavour to create and follow a process and achieve outcomes that a reasonable person would call just.

#### **Respect for others**

We will be open and direct in our communications and receptive to influence. We will honour and value the abilities and contributions of others, embracing the responsibility and accountability for our actions in this regard.

## Commitment to our stakeholders

### **To employees**

We respect the human rights of all employees, whether directly employed or sub-contracted in accordance with the UN Declaration of human rights and the International Labour Organisation Declaration on the fundamental principles of rights to work. We will strive to:

- Provide and maintain safe conditions of work, with competitive terms and conditions of employment.
- To treat all employees fairly and honestly, regardless of where in the world they work
- Not to use any form of forced or under-age labour
- To insist on a policy of diversity, by selecting, developing, and retaining employees based on ability and qualifications for the work to be performed, without any form of discrimination or prejudice under any circumstances.
- Insist that sexual harassment does not take place under any circumstances.
- Pay a fair wage reflecting local markets and conditions, always meeting any national minimum wage.
- Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.
- All staff have formal grievance procedures through which staff can raise personal and work-related issues.
- All staff will be given reasonable access to bathrooms and rest facilities.

### **To customers**

We endeavor to:

- Win and retain customers who adhere to business principles consistent with our own, by developing and providing products that offer value in terms of price, quality, safety and environmental impact.
- To be responsive to customer comments and complaints
- Maintain the quality of our products through constant and on-going review of aims, activities and outcomes, and the cost effectiveness of any activity. Through regular review meetings and internal systems and controls, we strive to provide a quality product.

### **To suppliers and business partners**

To seek mutually beneficial relationships with contractors, suppliers and joint venture partners. To require that, so far as is practicable, all of these adhere to business principles consistent with our own.

### **To the community**

To conduct business as responsible corporate citizens, to observe the laws of the countries in which we operate to give proper regard to the health, safety, and environment of local communities, and to be sensitive to and supportive of local cultural, social, educational and economic needs.

### Learning

We will actively invest in R&D. We will be open to suggestions and listen carefully to ideas. Our company will try to continuously improve the way it operates.

### Health, safety, and the environment

It is RAM Universal's policy to establish and manage safe and healthy working conditions for all employees. We seek effective and efficient ways to protect and enhance the environment in which we live and operate. To this end, we measure, appraise and report performance based on continuous improvement and with the longer-term aim of enhancing the sustainability of our business and that of our customers, suppliers, partners, and the wider community.

### Compliance, monitoring and reporting.

Compliance with this code is monitored and reviewed by the RAM Universal Directors, who shall ensure that it is communicated to all employees and its contents are understood and adhered to. Day-to-day responsibility in this regard is delegated to senior management. Breaches of the code must be reported to relevant senior managers, who expect employees to bring to their attention any suspected breach of this code. Provision is in place for employees to report in confidence directly to their relevant director, and no employees shall suffer because of doing so.

This code is intended to foster a search for continuous improvement in all aspects of our performance. It will therefore be reviewed annually and will be part of our on-going improvement programme.

It is the responsibility of all staff at RAM to ensure that the policy is communicated, implemented, and maintained throughout the company.

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Robert James  
Managing Director

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Richard James  
Managing Director