
Code of Conduct & Ethics Policy Statement

This Policy is applicable to all ExergInc Group companies; FuturEnergySystems Ltd, SmartCityZen Ltd, Clean Heat Provision Ltd, Serendipity Energy Services Ltd and Seeking Wisdom Foundation.

ExergInc Group (“the Company”) is committed to undertaking its business in a professional manner, to a high stand of conduct and in an ethical way. This Policy applies to all Group operations, subsidiaries, associate companies and its interests in Joint Venture (JV) consortia, Special Purpose Vehicles (SPVs) and companies (together “ExergInc”) and all ExergInc employees (“Employees”) and works in conjunction with related ExergInc and HR Policies and Practices. ExergInc expects similar practices to be followed by our Enterprise Partners (suppliers, subcontractors and business partners).

This policy sets out the standards which ExergInc expect its employees and Enterprise Partners to comply with our code of conduct and compliance with the law. These standards take precedence over local or industry wide ‘custom and practice’. Each Business Unit (BU) Managing Director and or Project Director within ExergInc is required to bring this Policy to the attention of all employees.

The Company recognises the importance of adhering to the principles of ethical business conduct in the delivery of its activities and is committed to operating its business sustainably and responsibly and in full compliance with all relevant laws and regulations whilst always acting with integrity.


Ethical business code of conduct includes:-

- **Bribery Prevention:** The giving or receiving of bribes is contrary to the Bribery Act 2010 (“the Act”) and can play no part in the way in which the Company carries out its business.
- **Fair and open Competition:** The Company adheres in all of its business practices to the principle of fair and efficient competition and does not engage in conduct which is anti-competitive – such as entering into agreements which restrict, prevent or distort competition.
- **Insider dealing Prevention:** If you are in possession of inside information about the Company, you must not deal in any securities (shares) of the group, or encourage or recommend someone else to do so, even if you will not directly profit from the dealing.
- **Fraud Prevention:** The Company has a zero-tolerance approach to fraud within the group or external organisations i.e. Enterprise Partners and will investigate all reports of suspicious or dishonest behaviour.
- **Whistleblowing:** The Company encourages employees and external organisations i.e. Enterprise Partners to raise their concerns about any malpractice at the earliest possible stage, and is commonly known as “whistleblowing”.

- **Conflict of Interest:** The Company recognises the importance of, and fully supports the need to, avoid and/or manage conflicts of interest and encourages its employees to report any potential conflict of interest to their Line Manager.
- **Gifts & Hospitality:** The Company has strict rules in connection with the giving/receipt of gifts or hospitality, to ensure there is no perception of bias and that business decisions are not subject to improper influence.

This policy is a declaration of the Company's intent to ensure all employees and external organisations act, and are seen to act, with uncompromising honesty and integrity in everything they do.

This Policy Statement will be reviewed annually or sooner subject to change in UK legislation and or lessons learned identified within ExergInc during its business activities.



David Smith
Group Executive Chairman
ExergInc Group

Date: 1st May 2024