



# CROSS MANUFACTURING Co (1938) LIMITED

Quality System: <b>Reference Document</b>	Reference Number: <b>CMR578</b>		
Title: <b>Cross Manufacturing Code of Conduct</b>	Issue 4	Date 08/11/2018	Page No 1 of 5

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## 1. Introduction

This code of conduct covers areas related to business values, environmental values, employment and workplace practice, and rejects any business practice that might reasonably be deemed improper. It applies to all members of the Board of Directors, and all employed by Cross Manufacturing Company (1938) Limited (“Cross Manufacturing”).

Cross Manufacturing encourages suppliers, consultants and other business partners within its circle of influence to adopt these values.

## 2. Business Values

### Legal Compliance

In every country in which it operates, Cross Manufacturing shall abide by the laws and regulations of that country. In situations where the law does not give guidance, Cross Manufacturing shall apply its own standards based on its corporate values and culture. In cases of conflict between mandatory law and the principles contained in this code, the law shall prevail.

### Ethical dealings

Cross Manufacturing shall not offer customers, potential customers, governments, agencies of governments, or any representatives of such entities, any rewards or benefits in violation of either applicable laws or reasonable and generally accepted business practices. Cross Manufacturing employees shall not accept payments, gifts, or other kinds of reimbursement from a third party that could influence or appear to influence business decisions.

Employees and other persons associated with Cross Manufacturing must not criminally facilitate the evasion of tax by third parties.

### Accounting and Reporting

All financial transactions by Cross Manufacturing shall be reported in accordance with generally accepted accounting practices, and financial statements shall show a true and fair view.

### Conflicts of Interest

Employees and members of the Board of Directors of Cross Manufacturing shall conduct their private and other external activities and financial interests in a manner that does not conflict or appear to conflict with the interests of the Company. Should such a conflict of interest arise, it shall be reported immediately by the person subject to the conflict to his/her immediate supervisor.

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#### Confidentiality

Any information received through business dealings shall be kept confidential and not used for personal gain. This includes both commercial and technical information. Appropriate non-disclosure and/or confidentiality agreements should be used to formalise the process of protecting proprietary information.

#### Political Involvement

Cross Manufacturing observes neutrality with regard to political parties and candidates.

### 3. Health Safety and the Environment

#### Health and Safety

Cross Manufacturing is committed to provide and maintain a safe place of work. For further details refer to the Cross Manufacturing Corporate Health and Safety policy HSP02.

#### Environmental Policy

Cross Manufacturing recognises that its operations have an impact on its employees, customers, the wider community, the environment and working practices and business relationships. Cross Manufacturing is committed to continual environmental improvement through the implementation of the Cross Manufacturing Environmental Policy CMR516.

Cross Manufacturing is committed to complying with ISO14001 and all relevant legal requirements.

### 4. Employment Standards

#### Diversity and Equality

Cross Manufacturing recruits and treats its employees in a manner that does not discriminate with regard to gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social or ethnic origin.

#### Labour

No form of forced, compulsory or child labour is tolerated in Cross Manufacturing. The minimum employment age is the age of completion of compulsory school.

#### Pay and Benefits

As a minimum Cross Manufacturing complies with all national and local regulations on pay, benefits and hours of work.

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## 5. Responsibility of Managers and Employees

It is the responsibility of Cross Manufacturing managers to communicate and demonstrate the values set out in this document. Reports of violations of this code may be done anonymously and confidentially to the Company Secretary. Persons reporting violations in good faith will not be subject to retaliation.

Failure to comply with the provisions of this code of conduct may result in disciplinary action. This Code of Conduct has been adopted by the Board of Directors of Cross Manufacturing and should only be amended or waived by the Board.

## 6. Code of Conduct for Suppliers

Cross Manufacturing enjoys a reputation for corporate trustworthiness, based on consistently conducting business with integrity and in compliance with the laws and regulations governing its activities.

All suppliers and contractors should have knowledge of the Cross Manufacturing Code of Conduct, and support these principles including the following aspects:

- Compliance with laws and regulations of the countries where the supplier operates; when the Local laws and regulations are lacking the principles in this Code shall guide.
- The principles described in this Code of Conduct should be the minimum level to be used in relations with their employees, business partners, stakeholders and should be flowed down to sub-suppliers if appropriate.

Cross Manufacturing expects its suppliers to maintain an open dialogue regarding Corporate Social Responsibility and will evaluate when necessary the compliance of suppliers with these requirements.

M E Bradley

Director & Company Secretary

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**Document Change Record**

Issue	Date	Change Detail	Issuer	Approver
2	03/07/2013	Rewrite and change layout to include Conduct topics in heading format.	M Bradley	
3	13/09/2017	Changed Health and safety document to HSP02	S Bird	M Bradley
4	08/11/2018	Adding a duty not to "criminally facilitate the evasion of tax by third parties" to the Ethical Dealings section	M Clark	M Bradley

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