

Restore



Our Code of Conduct



Contents

Message from Charles - 3

What happens if we don't follow Our Code of Conduct - 4

Speak Up -5

Part One - Looking after Ourselves

Staying Safe, Keeping Well - 7

Respecting Our Differences - 8

Respecting Human Rights and Preventing Modern Slavery -9

Fair Treatment - 10

Coming to Work Free from Substance Abuse -11

Part Two - Looking after Our Business

Bribery & Corruption - 13

Gifts & Hospitality - 15

Conflicts of Interest -17

Political Activities and Payments - 19

Working with Others - 20

Accurate Records, Reporting, and Accounting - 22

Money Laundering - 24

Competition and Antitrust - 25

Corporation Tax Evasion - 27

Share Dealing - 29

Part Three - Protecting our Information

Confidential Information - 32

Personal Information - 34

Cyber Security and Using our Systems - 37

Social Media - 39



Message from Charles Skinner, CEO

Dear Colleague,

You're about to read our Code of Conduct (Our Code), an important document that outlines the values we hold as a company, the way we operate our business and how we treat each other and everyone we work with. Our Code makes it clear who we are and what we stand for, and it is important that you follow it whilst you work for Restore in order to maintain our reputation and the trust of our stakeholders.

In Our Code you will find the actions and behaviours that are expected of ourselves and others as we do business. These will ensure we all work in a place where we feel safe, respected and valued where we do what is right and have the courage and support to speak up and challenge when something is wrong.

Our Code is also about ensuring that we run the business in a way that is fair and just, and where we hold ourselves to the highest standards. It lays down, in one place, our commitment to conducting our business transparently, ethically, and honestly and includes direction and guidance on how to do this.

Many parts of Our Code are based on laws and regulations to which we must comply with. Where these rules are broken, the company or individuals within it could face fines, legal penalties and even imprisonment. We might also damage our reputation and undermine the trust our customers and colleagues place in us.

So, we must always follow Our Code and never knowingly allow or encourage anyone to do anything which breaks it. Should we believe that Our Code has been breached, the company will investigate and act accordingly. The Board and I give you a clear assurance that any employee raising a concern in good faith, either about Our Code or any business matter, will not suffer from any form of retaliation.

Please take the time to read and understand our Code of Conduct and commit to applying it in all your business activities and actions.

Thanks,

Charles

Introduction to our Code of Conduct

High standards of ethical behaviour and compliance with laws and regulations are essential to protecting the reputation and long-term success of Restore. Our Code sets out the ethical standards that should govern the activities of Restore, its subsidiaries, its employees and any business partners. It gives guidance on recognising when and where ethical problems exist, and how to avoid them or what to do if they cannot be avoided.

Who does it apply to?

Our Code applies to all our employees, contractors and sub-contractors working in all of our businesses. We expect our customers, suppliers, distributors, agents and all other stakeholders we interact with to abide by it or to operate to similar standards.

Where does it apply?

Our Code applies across all our operations, wherever they are based.

When does it apply?

It always applies. Newly acquired companies will adopt Our Code from the date they join the Restore group.

What happens if someone breaches the Code?

Non-compliance with Our Code is a serious matter. It can lead to civil or criminal sanctions against Restore, its employees and business partners. It can also lead to:

- Internal disciplinary action for employees, up to and including dismissal.
- Immediate termination of any agreement with a business partner.

Getting more information or clarification

Our Code cannot address every possible ethical situation that may arise in the work environment. Employees therefore may need to seek guidance and assistance as appropriate and are encouraged to do so. Questions of interpretation on Our Code which cannot be resolved locally should be addressed to our Company Secretary.



Speak Up

Helping you speak up when something is wrong

As you read our Code of Conduct and what we expect of everyone that works here, you'll find one instruction that comes up throughout the document; if something doesn't feel right, if you suspect wrongdoing or you see someone not following Our Code, please tell someone.

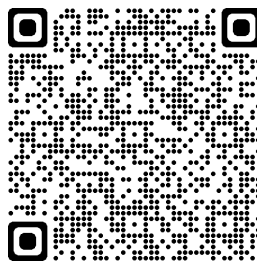
On the rare occasions we see colleagues or others breaking Our Code we have a duty to report it to a Manager or Senior Leader or someone in the People Team.

If you don't feel able to do that, we have partnered with an independent organisation to provide you with access to a free and confidential reporting service called Speak Up. We want you to feel safe when you are brave enough to let us know if something is wrong, and this service helps us to do that.

When you contact the Speak Up service to report any concerns you can remain anonymous if you wish. You will always be listened to, and your concern will be treated confidentially and investigated with complete discretion.

We will not let anyone act against someone who has raised a concern in good faith. We absolutely prohibit any retaliation against anyone who reports a violation of Our Code or helps with an investigation.

Speaking up, reporting wrongdoing, is always the right thing to do because it protects us all. By speaking up about things that are wrong, they can be put right. If nothing is said, the situation will inevitably get worse and increase the impact on you, on your colleagues and on our company.



Contact 0800 915 1571 or report online at
www.safecall.co.uk/report

Part One - Looking after Ourselves

- A. Staying Safe, Keeping Well - 7
- B. Respecting Our Differences - 8
- C. Respecting Human Rights and Preventing Modern Slavery - 9
- D. Fair Treatment - 10
- E. Coming to Work Free from Substance Abuse - 11

A. Staying Safe, Keeping Well

Across Restore we commit to continually seeking improvements in wellbeing and safety by always sharing best practices, new approaches, training, awareness, technology, and equipment developments. Ultimately, we put safety first.

We all have a part to play in and we ask for all colleagues to always take the time to work safely and look after our wellbeing too.

What we all need to know and do

- ◆ If we see something unsafe we always take responsibility to do the right thing and report it if needs be.
- ◆ We will stop work if we cannot carry out the task safely, reporting the reasons why.
- ◆ We will make sure we understand and follow the health and safety rules and guidelines that apply to our roles.
- ◆ We make sure we complete the safety training assigned to us to the best of our ability.
- ◆ When working we will always follow the right method statement, risk assessment, and safety procedure that applies.
- ◆ We will always wear the appropriate personal protective equipment and clothing and ask for it to be replaced if it is damaged.
- ◆ We will only operate equipment that we are trained and qualified to use.
- ◆ We will look out for each other and commit to treating mental health and social wellbeing issues as we would physical safety.

B. Respecting Our Differences

At Restore our strength is our people and their diversity. The ability to think differently, and to challenge norms allows us to meet the changing needs of our customers.

We believe in an equitable and inclusive workplace where we all can be ourselves and thrive, strengthened by our individual differences and diverse cultures. This means respecting the differences we find in our colleagues and recognising that we can learn from them.

What we all need to know and do

- We will respect every colleague as an individual, and we give everyone equal opportunities.
- We will take the time to listen and to understand our colleagues. We will appreciate they may say or do things in ways that may bring a different perspective and view.
- We will respect different values, beliefs, and opinions of others as well as the culture, customs, and traditions of the countries we work in.
- We educate ourselves and others, challenge unacceptable language and behaviours and welcome different ideas.
- We treat colleagues in a way they wish to be treated, rather than the way we wish to be treated.
- We welcome the innovation that comes with diversity. It can also make work more interesting, engaging, and fun.

C. Respecting Human Rights and Preventing Modern Slavery

Human rights are those rights we all deserve. They include the right to life, respect for privacy and family life, freedom of thought and religion, and the right not to be subjected to modern slavery.

We also have the right to be treated with respect and dignity and we want the places where we work to reflect this.

We recognise the scourge of modern slavery. We will not tolerate, in any context, the use of servitude, child labour, forced labour, human trafficking, or slavery in any of our operations or in our suppliers and customers.

What we all need to know and do

- ◆ We will respect and protect the dignity and human rights of our colleagues and everyone we deal with in our work. This includes our business partners and suppliers.
- ◆ We will remain watchful. If we suspect any kind of human rights abuse, and we report it straight away to a manager, local People team or using the Speak up service.
- ◆ We are all responsible for keeping our workplace free from abuse.
- ◆ We are especially alert to signs of modern slavery, forced or child labour. If you see or suspect these signs report it to a manager, People Team or using the Speak Up service.
- ◆ We will only work with approved suppliers and business partners who have been subject to appropriate due diligence.
- ◆ We always take the greatest care to not knowingly take part in, or benefit from, any activities that break any law relating to human rights and we take the greatest care to ensure there is no human rights abuse, slave labour or human trafficking in any part of our operations including our supply chain.

Our policy statement on Modern Slavery and Human Trafficking is available on our website.

D. Fair Treatment

Providing opportunities that are fair and equitable for all is important to us. We all want to work in an environment where we are given equal opportunity to be at our best, to develop our talents, and to build our careers.

Therefore, it's in our interests to stop unfair treatment and discrimination completely. By doing this we stop it from becoming an established part of our culture.

What we all need to know and do

- ◆ We treat others in the way they wish to be treated – fairly and equally.
- ◆ We take time to understand what behaviours are inappropriate so that we don't discriminate against others, even unintentionally.
- ◆ We strive to ensure our personal feelings, prejudices, and preferences don't influence our decisions.
- ◆ We never discriminate against a colleague for any reason, including their gender, race, colour, national or ethnic origin, sexual orientation, gender identity or expression, religion, political beliefs, marital status, trade union activity, disability, age, citizenship, or any other characteristic, protected by law or not.
- ◆ We are always mindful of our messages ensuring they are not offensive messages or make derogatory remarks and inappropriate jokes.
- ◆ If we see or suspect someone is being treated unfairly, we report it immediately.

E. Coming to Work Free from Substance Abuse

At work, substance abuse can do serious physical harm and can damage relationships and team performance. Health and safety can be compromised leading to serious incidents and injury.

It can be difficult and can seem wrong to report a colleague we know is having difficulties with addiction or whose substance or alcohol use is affecting their performance. But if we know it's happening, we must report it. It keeps us all safe and ensures the colleague gets the help they may need.

What we all need to know and do

- We come to work free from alcohol, drugs and other substances that could affect our performance.
- We never use, sell, or distribute illegal drugs or substances or abuse alcohol at work.
- We will seek professional help as soon as possible if we have a drug, substance or alcohol problem. We will follow all the requirements and guidance for our recovery. If we don't and our substance abuse puts others at risk, disciplinary action could follow.
- We will inform our manager if our doctor has prescribed drugs or medication which may affect our performance at work. We will not be penalised for this but Restore will need to know to ensure the safety of all.
- We recognise that poor performance, misconduct, or excessive absence can result in disciplinary action. Sometimes this may occur alongside our recovery support.

Part Two- Looking after Our Business

- A. Bribery & Corruption - 13
- B. Gifts & Hospitality - 15
- C. Conflicts of Interest - 17
- D. Political Activities and Payments - 19
- E. Working with Others - 20
- F. Accurate Records, Reporting, and Accounting - 22
- G. Money Laundering - 24
- H. Competition and Antitrust - 25
- I. Corporation Tax Evasion - 27
- J. Share Dealing - 29

A. Bribery & Corruption

Bribery and corruption undermine everything. If we are seen to be involved, even in the smallest way, it will impact ourselves, our jobs and those who we are close to. Just being suspected can cause a great deal of harm.

That is why we do not tolerate bribery or corruption of any kind, be it the making or receiving of bribes, undue payments or kickbacks from suppliers or service providers, whether made directly or indirectly. This includes a prohibition on “facilitation payments” or small bribes paid to facilitate routine government action and applies both to our relationships with government officials and dealings with customers and suppliers from private sector companies.

What we all need to know and do

- We are honest and we want everyone to trust us for that. We know that even the suspicion of corruption can destroy that trust and cause significant damage.
- We never take part in any form of corruption or bribery (including facilitation payments) no matter how small the payment and no matter what the ‘local custom’ may be – and we don’t get others to do it for us.
- We would rather forego business or lose money than become involved in corruption even on the smallest scale.
- If someone offers or asks us for a bribe, or even if we just hear about it or are worried it might be taking place, we always report it by telling a Manager, the People Team or using the Speak Up service.
- We always report any possible corruption or bribery.
- We always record and obtain receipts for every legitimate payment we make. These are fees that are fixed and clearly published – for example, to quickly process a visa application – and payment for them should be transparent and open.

- ◆ We take the greatest care if we give or receive gifts or entertainment, and always follow our Gifts and Hospitality guidelines (see below).
- ◆ When we find ourselves working with business partners, agents, contractors, and suppliers, we make sure we're comfortable with their honesty and integrity, and that they understand and follow the rules of our Code.

Exceptional Circumstances

- ◆ On very rare occasions you may be coerced into making an illegitimate facilitation payment. If you or others are in immediate danger or being threatened, then you should pay. However, you must always record the payment and the circumstances, and report the details immediately to your manager, senior manager or use the Speak Up service.

B. Gifts & Hospitality

Exchanging gifts and hospitality can be part of normal business and can help build goodwill. But unless we're careful, they could look like a bribe – even if they're not meant to be.

Gifts and hospitality can be used to try to improperly influence others. Sometimes they are intended to make someone feel that they 'owe' whoever gave the gift or provided the hospitality. They can even be a form of payment given to someone as a reward if they make a business decision in your favour.

Used like that, gifts and hospitality are a form of corruption and not acceptable. That's why it's so important to follow the rules.

That's why we have clear procedures we all need to follow, and why we must all register any gift or hospitality we offer or receive. If in doubt, we always check it and record it.

Special care should be taken when dealing with government officials, both because their own regulations are often particularly tight, and because bribing or corrupting a government official is a serious criminal offence. You may not offer gifts or entertainment to government officials or their families, either directly or through an agent, without the prior approval of your Business Unit MD, the Chief Financial Officer or the General Counsel/Company Secretary.

What we all need to know and do

- ◆ We should never directly ask for a gift or hospitality.
- ◆ We must register all gifts and hospitality received, regardless of value, in the Gifts and Hospitality Register by completing the form available on Circle under the Governance section of 'The Hub'.
- ◆ All gifts or hospitality with a value of £100 or more must have prior management approval which can be requested by completing the same registration form. Don't delay – always do it straight away.

- ◆ We always ensure that any offer of gifts and hospitality by Restore to a third party has the prior approval of the Business Unit MD in order to avoid any perception of trying to exert improper influence.
- ◆ If you return a gift, do so immediately, along with a written explanation.
- ◆ Please consider sharing the gift with colleagues or donating the gift to a charity.

For more information on the process to register a gift or offer of hospitality, please see Circle.

C. Conflicts of Interest

A conflict of interest can be defined as when the personal interests of an employee compete with the interests of Restore. Personal conflicts of interest should be avoided. Personal interests can include those of your family, including your spouse, children, parents or siblings, or companies in which you hold a controlling interest.

Conflicts of interest can do great damage to those involved, and to our reputation - even if no one ever intended to gain an unfair or illegal benefit or become involved in bribery.

That's why understanding and declaring any potential for a conflict of interest before it may take place is the key to preventing harm and avoiding prosecution.

Just the perception that a conflict of interest has influenced a particular outcome can undermine a company's integrity. Which is why we must always declare any potential conflict of interest as soon as we are aware of it.

What we all need to know and do

- ◆ It's so important for us to identify and always declare any actual or potential conflict of interest we may have. If we're not sure, we always ask. We never leave room for doubt.
- ◆ We do not engage in activities that compete with Restore's business, either directly or indirectly, or use knowledge gained while working for Restore to help anyone else compete with it.
- ◆ Conflicts of interest open the door to bribery and corruption.
- ◆ It's so important for us to identify and always declare any actual or potential conflict of interest we may have. If we're not sure, we always ask. We never leave room for doubt.
- ◆ We always decline any incentives that could give us any reason to act against the best interests of Restore or do anything that might mean Restore has an unfair advantage.
- ◆ We always make business decisions on behalf of Restore rather than our own personal interests or the interests of our family or friends.

- ◆ We always report any outside business relationships or roles we have to our manager.
- ◆ We must never have any financial interest in a supplier, including investments and debts. This applies if we have any kind of relationship with them, either directly or through someone who reports to us.

D. Political Activities and Payments

As a company, we may contribute to public debates about policies that affect our business.

However, when it comes to political parties, Restore must stay impartial and not favour one over another.

All of us who work for Restore have our own interests outside work and have the absolute right to engage in lawful political activity in our own time. However, we do need to keep our personal political activities separate from any role we have at Restore to protect the company's interests and reputation.

So as employees of Restore, we need to take care that nothing we do or say compromises the impartiality of the company or involves it in our own personal political agenda.

What we all need to know and do

- We never use company funds or resources to support any political candidate or party.
- Personal political activities can sometimes create a conflict with Restore. So, if we or a close relative are planning to accept or seek a public office, or if any other political activity might have an impact on Restore or on our job, we always talk to our manager.
- If we're going to contact politicians or those with political influence, we always get approval from our communications teams and manager before doing so. And we take the same care if we are going to attend a political party's event for briefing purposes.
- Unless we've been authorised to speak on Restore's behalf, we always make it clear that our opinions or views are personal and do not represent Restore's position. We do the same if we're asked to speak at any external events and aren't authorised to speak on the companies behalf.
- Our political beliefs are ours. We do not broadcast these on Circle or Viva Engage and should be cautious about sharing such views on public platforms.

E. Working with Others

The relationship between Restore and its suppliers, strategic partners and agents is key to achieving high performance in our business. We must, therefore, develop long-term relationships with the suppliers and third parties based on mutual trust.

We create that trust by treating our suppliers and third parties with the greatest respect, valuing the contribution they make to our business.

We also expect them to do as we do. That means working to the standards we work to, obeying all applicable laws and regulations and sharing our values.

When we buy goods and services, we don't just look at the price and value for money. We also consider their social, ethical and environmental impact. That means taking account of the whole life cycle of our purchases, doing all that we can to deliver positive impacts to people and the environment through the contribution and jobs our suppliers and third parties are bringing to their communities.

To understand who we are working with we conduct due diligence on all third parties before we ask them to start working with us. Background checks on the reputational risks around that new business partner should be made, including but not limited to risks around bribery and corruption, slavery, sanctions, environmental and health & safety issues, and whether that organisation has been subject to reputational issues in the past.

All business partners must follow ethical principles that are consistent with our own, including our anti-bribery policy and our commitment to fair labour conditions. We will terminate business relationships with third parties who engage in questionable or unlawful business practices and report them, when applicable, to the relevant authority.

We select agents, representatives and subcontractors on the basis of their professional expertise and not on account of personal contacts. All agents and distributors must be appointed with written agreements setting out the services to be rendered, structure of fees to be paid and to include an express prohibition on bribery and compliance with this Code.

We abide with all economic sanctions. If you are involved with a transaction that potentially involves a sanctioned country, entity or person, you must ensure that due diligence is carried out in advance of entering into the transaction. Trade sanctions are complex and constantly changing, and advice should be sought in advance from the General Counsel/Company Secretary.

What we all need to know and do

- We always clearly define and apply consistent, fair, and transparent procurement processes and work within delegated approval authorities.
- We always provide accurate information, never try to cheat anyone, and will not work with anyone who does.
- We treat our suppliers, partners and agents with respect and deal with them fairly and honestly.
- We will pay our suppliers, contractors and agents in accordance with agreed contractual terms and expect the same from our customers.
- If we need to engage a third party, we always make sure we know, understand, and follow our procurement policies and processes. These include completing screening and onboarding due diligence and contracting and ongoing supplier management.
- We will only use approved suppliers and third parties.
- To avoid even the appearance of impropriety, we know, understand, and follow the company's policies on gifts, entertainment, and hospitality. If any third party tries to offer something of value that exceeds Restore's thresholds and approval requirements, we report it at once. If we're not sure how to manage the situation, we ask for advice from our manager.
- We never turn a blind eye to what a third party may be doing. If there's a rumour about any kind of malpractice or anything we see or hear causes us concern, we follow it up, or report it.

F. Accurate Records, Reporting, and Accounting

We must all ensure our books and records are accurate. This will help us understand how we are performing and ensure we are doing things right. If we're not accurate, we can be accused of fraud.

Even if it's unproven, an accusation of trying to commit fraud by misreporting or falsifying records or accounts can destroy our reputation for financial integrity and honesty.

If that happens, we can lose the trust we depend on to carry on doing business.

That's why we have detailed procedures for the recording and reporting of information, and robust financial controls that we must all follow – so there can be no doubt that our books and records always accurately reflect the true state of our business, our costs, and our transactions.

Keeping our books, records, and financial reporting complete and accurate is our best defence against fraud.

What we all need to know and do

- ◆ If we are involved in any way in recording and reporting of information (both internally or externally), or performing a financial control, it's our job to make sure we do it with care and diligence.
- ◆ If our job involves developing, managing, or operating financial processes, controls, or accounts, then we must know and follow the internal governance framework.
- ◆ Where we operate controls, we must be able to demonstrate that they are effective and will stand up to scrutiny from any internal or external review.
- ◆ We must ensure that invoices we send to our customers include accurate information, and we have the documentation to support the goods and services which we are billing for.

- ◆ All of us, wherever we work and whatever job we do, must accurately and honestly report our performance, time, and expenses.
- ◆ We never make false or misleading statements or submit false claims.
- ◆ If we need to claim travel expenses, we need to keep proper records and receipts so we can submit these with our claim.
- ◆ We never get involved in any activity that is designed to commit fraud or misrepresentation, or that could be reasonably interpreted as an attempt to do so.
- ◆ If we think or just suspect that fraud may be going on, we always report it immediately to a manager or by using the Speak Up service.
- ◆ Despite our best efforts, we all make mistake sometimes. So, if we discover that any of our records aren't accurate because of an error, it's essential to report it immediately. That way the mistake can be put right hopefully before any damage has been done.

G. Money Laundering

Money laundering is a criminal offence. It allows criminals, including terrorists, to take money they have gained through crime and pass it through a series of complex and deliberately obscure banking and commercial transactions, so the illegal origins are concealed, and the money is “cleaned” – like a laundry cleans dirty clothes. The criminals then have access to what now appears to be legitimate money.

There are two vital things we are totally committed to doing to prevent money laundering taking place in any part of our business: we follow all our internal policies and procedures and we stay alert. If we suspect anything - we report it.

Signs of money laundering relating to customer payments to Restore may include:

- ◆ From multiple bank accounts.
- ◆ From bank accounts overseas when not a foreign customer.
- ◆ Made in cash when normally paid electronically.
- ◆ Received from other third parties.
- ◆ Made in advance when not part of normal terms of business.

What we all need to know and do

- ◆ We only do business with customers and third parties involved in legitimate business activities, and ensure all funds and payments are from legitimate sources.
- ◆ We ensure that third parties are screened to assess their identity and legitimacy before contracts are signed or transitions occur.
- ◆ We stay alert - and maintain controls to detect, investigate and report suspicious activity.

H. Competition and Antitrust

It's important for everyone – businesses and consumers – that there's fair competition so no company has an unequal advantage over another, and cannot abuse its position to control prices, or win business unfairly.

Competition and anti-trust laws can be complicated. So acting within the law and ensuring that we always do what's fair often involves going the extra mile to make sure we are doing all we should, and never doing what we shouldn't.

In the UK, the government has competition and anti-trust laws that impose constraints on us as a business. It is therefore important that we act appropriately and transparently in our dealings with customers, business partners, suppliers, and competitors.

Just remember – if you have any doubts at all, your line manager or legal and compliance team can help. If in doubt - always ask.

What we all need to know and do

- ◆ We take care to know and follow competition or antitrust laws and we compete openly, fairly and honestly.
- ◆ We never exchange commercially sensitive information (including prices, production details, sales volumes, market shares, strategy, organisation structure or costs) with competing companies.
- ◆ We never seek to gain information about competitors using underhand means.
- ◆ We never form an agreement with competitors that might fix prices, rig bids, allocate customers and/or restrict supply.
- ◆ We never boycott customers or suppliers or enter into any other anti-competitive agreements.
- ◆ We conduct our business based on our own independent decisions so we do not use illicit information we may have acquired or know about to shape the business decisions we make.

- ◆ When we work with partners, or when we partner with competitors to bid for and deliver business together, we need to make sure what we offer and do is ethical and legal, does not disadvantage our customer, and does not misrepresent anything to them.
- ◆ Before releasing information to a third party, we always have a properly drafted Non-Disclosure Agreement (NDA) signed and in place, and carefully check if we need to redact any documents before handing them over.
- ◆ We are always accurate and truthful in any bids or contract negotiations we make with prospective customers.
- ◆ We make certain that any business information we use has been obtained legitimately and can be used lawfully.
- ◆ We will never try to gain an unfair competitive advantage.
- ◆ If we receive any confidential or competitively sensitive information about a competitor, either directly or indirectly (for example through a customer), we do not circulate or use it, and consult our General Counsel/Company Secretary if in any doubt.
- ◆ We always seek legal advice if we are not sure how to proceed.
- ◆ We never use influence to intimidate anyone or coerce anyone into anti-competitive behaviour.
- ◆ If we suspect or become aware of any behaviours or practices which may breach competition and antitrust laws, we report them straight away to a manager or use the Speak Up service.

I. Corporation Tax Evasion

Tax evasion is the illegal and deliberate non-payment of taxes, usually resulting from the making of a false declaration or no declaration at all of taxes due to the relevant tax authorities.

Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, or aiding, abetting, counselling or procuring the commission of that offence.

Tax evasion and the facilitation of tax evasion is criminal conduct and can have severe penalties, both for the individual responsible and Restore.

Common offences of tax invasion include:

- ♦ Evasion of income tax - for example making payments “cash in hand”.
- ♦ Evasion of VAT - for example, requesting payment without issuing a proper invoice.
- ♦ Providing false documents or information to tax authorities.
- ♦ Evasion of excise duty on imported goods - for example by not declaring goods which have arrived in the UK from overseas.

What we all need to know and do

- ♦ We must always follow Restore policy in relation to agreements with customers and suppliers, and the issue of invoices and processing of payments.
- ♦ We must never engage in any form of facilitating tax evasion or foreign tax evasion.
- ♦ We must never aid, abet, counsel or procure the commission of a tax evasion offence or foreign tax evasion offence by another person.

- We must at all times promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax (whether UK tax or tax in a foreign country), or any suspected fraudulent evasion of tax (whether UK tax or tax in a foreign country) by another person, in accordance with this policy.

If there is any doubt about whether something we have been asked to do relating to taxation (by a colleague or a third party) is appropriate, seek advice from your Business Unit FD or a member of the Group Finance team.

J. Share dealing

Around the world stock markets enable us to buy and sell shares in different companies. The value of these shares goes up and down. If you buy at a lower price and the share value goes up, you make a profit. Restore is a listed company on the London Stock Exchange and our employees must comply with the relevant securities laws.

So long as everyone involved in trading has the same information, then the market is fair. But if someone who works for a company and knows something that could affect its share price and tries to get an undue advantage from using that inside information to make money or letting someone else know who wants to do the same thing, that destroys the integrity of the market.

As an employee, you must not use inside information to trade in Restore's shares. Similarly, if you become aware through your role of inside information about another company (potentially an acquisition or merger), you must not use that inside information for trading in that company's shares. Inside information is information that is confidential within Restore, is precise in nature, not generally available and could have a significant effect on our share price if it becomes public. Inside information could be the detail of our financial results, trading updates, acquisitions or disposals of businesses or material commercial developments (new contracts or disputes).

To use inside information for dealing in our shares or encouraging others to do so is market abuse and a criminal offence.

Inside information and the risk of insider trading applies to you as an employee and those connected to you, be it your spouse, children, family relatives living in the same house, or a business in which you have a controlling interest.

Directors and senior employees who have been formally notified by the General Counsel/Company Secretary are subject to our Share Dealing Code, which place further restrictions upon these individuals in terms of dealing in our shares. If you are at all unsure whether you are in possession of inside information and whether this impacts you in terms of dealing in Restore's shares or other listed securities, you should contact the General Counsel/Company Secretary before trading.

What we all need to know and do

- ◆ As part of our employment, we may learn non-public information about Restore or its related companies. In that case, we cannot and must not use it for personal or financial benefit - for example to buy or sell shares – and we must not share it with others.
- ◆ While holding inside information, we must not:
 - Trade in Restore shares by purchasing or selling them directly or indirectly.
 - Recommend, advise encourage or 'tip off' anyone to trade in our shares.
 - Disclose the information we have to another person. This includes any inside information we may have about Restore or other companies related to Restore.
 - If we become aware of any incidents or potential incidents of Insider Dealing, we report these at once to a manager or use the Speak Up service.
 - If we are in any doubt we seek advice from the General Counsel/Company Secretary.

Part Three - Protecting Our Information

- A. Confidential Information - 32
- B. Data Protection Principles - 34
- C. Cyber Security and Using Our Systems - 37
- D. Social Media - 39

A. Confidential Information

Any information is confidential if it has value to Restore and is not publicly available. That includes commercially sensitive information and intellectual property obtained from colleagues, customers and partners or marked as such.

But confidential information isn't just commercial information. It also includes any personal information and details that we hold in trust about anyone who works for us.

If we allow confidential information to fall into the wrong hands, it can cause immense harm to individuals, to our company, our partners, and customers. The task for all of us is to make sure none of it ever does.

What we all need to know and do

- ◆ We carefully assess and manage the risks of any information we handle.
- ◆ We retain proper records of our business activities.
- ◆ We never falsify or hide records and accounts.
- ◆ We never alter or destroy records or documents unless we have approval to do so.
- ◆ When we create or receive confidential information, we assign it a confidentiality marking classification and only share it with those who are entitled and permitted to receive it.
- ◆ We take special care to protect confidential information when we are away and not in Restore's offices.
- ◆ If authorised to share information, we only do so where a signed Non-Disclosure Agreement (NDA) is in place.
- ◆ When working with third parties, we check that we are authorised to share information before doing so.
- ◆ We always maintain the confidentiality of customer and employee information unless they have given written consent, or the law requires or allows disclosure.

- ◆ We manage and properly protect our intellectual property when dealing with our company's records and information.
- ◆ We never reveal confidential information about Restore, a customer or an employee if we leave to work elsewhere.
- ◆ Similarly, if we previously worked for a customer or competitor, we keep the information we obtained there confidential. No one should ever try to coerce someone into disclosing confidential information about a previous employer.

B. Personal Information

None of us wants to have our privacy invaded or our identity stolen. We don't want it to happen to the people we work with either. So, it's in all our interests to keep personal information safe and secure, and only ever use it for the right purpose.

Restore handles all sorts of personal information about us, and our customers, colleagues, business partners and their employees. Much of it is sensitive - like health details or bank account numbers.

If we let this information get into the wrong hands or do not process it properly, it can cause huge distress, damage and harm to individuals and expose them to financial scams and identity theft.

To protect us and ensure we properly protect and only use personal information for the purpose for which it was intended, we have to follow a set of Data Protection Principles. We must all follow these principles whenever we handle personal information. If we don't, people can have their privacy invaded, we can face disciplinary action and do serious damage to Restore and any other organisation that may have been involved.

Data Protection Principles

Transparency	We always process personal data lawfully, fairly and in a transparent manner	Integrity & Confidentiality	We will always ensure the appropriate security of the personal data we process.
Accuracy	Personal data shall be accurate and kept up to date	Data Minimisation	In processing personal data, we will make sure that our processing activities are adequate, relevant, and limited to what is necessary.
Accountability	We will always be able to demonstrate compliance with these principles	Storage Limitation	We will keep personal data in form which allows the identification of persons no longer than is necessary
Purpose Limitation	We will only collect personal data for specified, explicit and legitimate purposes		

What we all need to know and do

- ◆ We ensure personal information is only used for the reason that it was collected and only shared with those who have a valid or legitimate reason to receive it.
- ◆ Personal data is always retained and managed in accordance with our Data Protection Principles.
- ◆ If we become aware that personal data is being used outside the Data Protection Principles, we Speak Up immediately. We can notify our manager, Data Protection Champion, Information Security Lead or Data Protection Officer.
- ◆ We maintain the correct privacy standards when dealing with personal data. We ensure it is processed in accordance with Restore's standards, or our customer's requirements where those apply.
- ◆ We take care to keep our own personal data up to date. We promptly notify our manager or People Services of any changes.
- ◆ We never disclose personal data to anyone who doesn't have the right to see it or the need to know it.
- ◆ We take great care and work with our manager, Data Protection Champions, Information Security Lead, or Data Protection Officer when we have to transfer or access personal data internationally to ensure we are following the rules for transfer in another jurisdiction.
- ◆ We securely destroy personal data when it is no longer needed, or when required by Restore's data retention policy.
- ◆ When storing personal data, we ensure it is in a protected environment. We never leave personal data on a printer, shared server or publicly accessible computer or website.

Restore's Data Protection Policy Data Management and Privacy Management Framework are available on Circle.

D. Cyber Security and Using our Systems

Our systems are at the heart of the services we provide to our customers. Without them, none of us would be able to do our jobs properly and our business would grind to a halt.

However, we know all too well how people, companies, and government agencies are routinely targeted by cyber criminals, those who may disagree with our customers' policies, or even a colleague who may have a grudge against us and seek to steal information, extort money and paralyse key operations.

Protecting our systems from attack and keeping our information safe is up to all of us. Which is why we always remain mindful of the risks and follow the rules.

We have robust systems in place, but every one of us has a vital role to play in ensuring our information is fully protected - by being alert to the threat and following IT security rules carefully at all times.

What we all need to know and do

- We always comply with IT security requirements, taking particular care with login credentials, tokens, and passwords.
- We never click on e-mails or attachments if we do not recognise the sender or if the email looks suspicious, as they may contain malware.
- We never share our Restore or customer IT login details with others. If we think they have been compromised, we change them and report it to our manager or IT department immediately.
- We don't use our Restore email to register for any online service (i.e. a website that required registration to create an account) unless the use of the service is business related.
- We never use personal email accounts for work communications.
- We always lock our computer and mobile device when leaving it unattended.
- We never leave important documents or printed information lying around.
- Unless instructed to do so by our IT team, we never modify or disable the security or other configuration settings downloaded by Restore to our company IT equipment.

- ♦ We never use USB drives received from unknown third parties as they may contain malware. We only use approved Restore encrypted removable media, and then only when specifically authorised.
- ♦ When we use a portable computer, laptop, tablet, mobile device, or removable media outside secure premises, we must make sure it is properly encrypted. If we are in any doubt, we consult our IT Department.
- ♦ We maintain the correct level of privacy for our information and ensure it is classified in line with Restore's standards, or with our customer's standards where this has been agreed.

Personal Use

Restore logs and monitors use of its IT equipment and any equipment which is connected via the Restore network. We are welcome to use Restore's systems for limited personal use, provided that:

- ♦ our usage is occasional and brief;
- ♦ it doesn't increase risks to Restore systems and information;
- ♦ it doesn't detract from our performance or that of our colleagues;
- ♦ it doesn't harm Restore's reputation or interfere with business;
- ♦ we do not access unsuitable Internet sites;
- ♦ we do not feature the Restore name and brand in personal e-mails or social media posts.

We never access, store, send or post pornography or other indecent or offensive material when using Restore IT and communication facilities. Likewise, we never connect to online gambling sites or conduct any kind of unlawful activity.

We never connect non-Restore or private IT equipment to Restore or customer networks without our IT department's permission.

If we have a Restore computer, mobile phone, or tablet, we follow the acceptable use policy.

We never copy or store personal files or personal music, videos, etc. onto Restore-provided PCs.

E. Social Media

Social media has created amazing new opportunities, both in our personal lives and in the way we do our jobs. But we know it also has a downside.

A post that's even slightly inappropriate, unintentionally, or otherwise, or one that's simply open to misinterpretation, can damage the reputation of our business or customers or us as individuals.

So when using social media we take care not to say anything that's inappropriate, or abusive, or that gives away confidential information.

And we always think twice before we post.

What we all need to know and do

- We are responsible, as individuals and as a business, for everything we publish on social media.
- Unless we're authorised to speak for Restore, we make it clear that any opinions we express about Restore are our own and do not reflect those of Restore.
- Our content should respect all religious, political, economic, and racial differences and opinions.
- Anything we state as fact must be accurate and fair. If we make mistakes, we correct them as soon as possible.
- We never post content that is discriminatory or constitutes a threat, intimidation, harassment, or bullying.
- Likewise, we never post content that is indecent, offensive, or defamatory.
- Our content must always respect the privacy of others.
- We never disclose confidential business information about Restore or our customers, business partners or suppliers.
- We tell our manager if we find online material about Restore which is wrong, unfair or defamatory.

- ◆ When we identify ourselves as Restore colleagues, we abide by the behaviours and values of Our Code. Our profile and content should be consistent with the way we would present ourselves and Restore to colleagues and customers.
- ◆ When we use social media in the workplace with company facilities, our content must be in line with Restore standards on acceptable use.
- ◆ If Restore thinks something we say is not appropriate, then we may be asked to remove it. In some circumstances we could face disciplinary action.

