

SOCIAL & ETHICAL POLICY

Principle

M J Church's values of performance, improvement, innovation, trust and integrity guide everything that the Group does as a business and form the basis of its relationships with all its stakeholders.

Specifically, M J Church has laid down the following social and ethical policies to be implemented at all units:

Policy

Standard of Conduct

- M J Church will conduct its operations with honesty, integrity and openness and with respect for the rights and interest of its employees. It will similarly respect the legitimate interests of those with whom it has relationships.

Obeying the Law

- M J Church companies and their employees are required to comply with the laws and regulations of the countries in which they operate.

Employees, Labour Rights and Conventions

- M J Church is committed to maintaining working environments where there is mutual trust and respect and where everyone feels responsible for the performance and reputation of the company.
- M J Church companies will not use any form of child, forced or compulsory labour.
- M J Church companies will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed to perform the work. Discrimination is forbidden on the grounds of gender, age, race, national origin, religion and disability.
- M J Church respects the dignity of individuals and legal right of employees to membership in trade unions.
- M J Church companies will implement remuneration practices in compliance with legal requirements.
- Employees will be encouraged to develop their job skills through specialist training and development programs where appropriate.

Customers and Suppliers

- M J Church is committed to providing customers with products, systems and solutions which offer good value in terms of price and quality.
- M J Church is committed to establishing mutually beneficial relations with its suppliers, customers and business partners.

Shareholders

- M J Church will conduct its operations in accordance with accepted principles of good corporate governance. It will provide timely, regular, reliable and accurate information on its activities, financial situation and performance to all shareholders. M J Church employees in possession of information which, if disclosed, could affect the market price of its shares are prohibited from trading in securities until after public disclosure of such information.

Business Integrity

- M J Church companies and employees will act in good faith in all business decisions.
- M J Church policy is not to give or receive inducements for business or financial gain. No employees may offer, give or receive any gift or payment which is, or may be construed as being in inducement. Any demand for, or offer of, an inducement will be rejected immediately and reported to management.
- M J Church accounting records and supporting documentation will accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.
- The parties with whom M J Church does business are expected to commit to corresponding levels of business integrity.

Conflicts of Interest

- All M J Church employees are required to avoid personal activities and financial interests which could conflict with their responsibilities to the company. Where conflicts of interest arise, they should be openly acknowledged and reported to head office. M J Church employees must not seek personal gain from third parties nor contribute to the funds of groups whose activities are calculated to promote party interests. Any political statements made by employees are made in their personal capacity.

The Environment

- M J Church is committed to making continuous improvements in the management of its environmental impact and further details are given in the Environmental Policy.

Health & Safety

- M J Church is committed to full compliance with health and safety regulations in the workplace for all employees and further details are laid down in the Health & Safety Policy.

Group Property

- M J Church employees are expected to properly preserve Group property including inventories, fixed assets and intellectual property and properly utilize employee time as far as is reasonable and practicable, only for the legitimate business interests of M J Church. Property may not be loaned or disposed of except in accordance with established group policy.

Confidentiality

- M J Church employees have a duty to protect confidential information and ensure that it is not communicated to the public or external parties. Authority for disclosures of such information will only be granted with the approval of appropriate senior company officials.

Competition

- M J Church companies and their employees are required to comply with all competition laws and to promote the conduct of company operations in accordance with those laws and regulations.

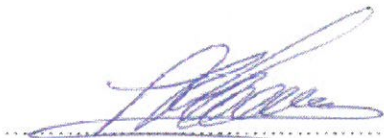
Communication, Compliance and Reporting

- M J Church has communicated these social and ethical policies to all operating units which, in turn, are required to communicate the content to employees.

Management of each operation will be required to confirm compliance with the policies each year.

The board of M J Church expects employees to bring to the attention of appropriate senior officials of the Company, or the Company Secretary, any breach or suspected breach of these policies. Employees are allowed to communicate breaches anonymously in confidence and no employee will suffer as a consequence of so doing.

For & on behalf of M J Church



S.P. Blower.
Managing Director

Last reviewed: April 2015