

AEROSPHERES (UK) LTD

Ethical Policy

1. Purpose

Aerospheres (UK) Ltd (“the Company”) is committed to responsible corporate behaviour and to protecting the human rights and basic freedoms of its employees, agents, and all those whose work contributes to the success of the Company, including employees and agents of its suppliers. This policy applies to all activities of the Company and should be read alongside the Company’s other policies referenced in Section 9.

2. Business Ethics

The Company expects the highest standards of ethical behaviour from everyone who works for it or represents it and applies this policy across all aspects of its business, including situations not expressly addressed elsewhere in this document.

Officers, employees, agents, contractors and other representatives are expected to act with honesty, integrity and professionalism in their dealings with colleagues, customers, suppliers and the wider community, and to avoid actions that could bring the Company’s reputation into disrepute.

Where an ethical question arises that is not directly addressed elsewhere in this policy or the Company’s related policies, staff should apply the principles set out in this section and, where in doubt, raise the matter with their line manager.

3. Human Rights

The Company supports the protection of internationally recognised human rights, including the Human Rights Act 1998 and the Modern Slavery Act 2015 (see the Company’s Modern Slavery Policy, QP36), and will not knowingly enter into a business arrangement with any person, company or organisation that fails to uphold the human rights of its workers or that breaches the human rights of those affected by its activities.

4. Workers’ Rights

The Company complies with relevant employment legislation and regards these as the minimum rather than the recommended standard.

No worker should be discriminated against on the basis of age, gender, race, sexual orientation, religion or belief, gender reassignment, marital status or pregnancy. All workers should be treated equally, and workers with the same experience and qualifications should receive equal pay for equal work. Workers are free to join a trade union without detriment.

Workers are made aware of the terms and conditions of their employment or engagement from the outset, including the wage they receive, when and how it is paid, working hours and any applicable legal limits, overtime provisions, and annual leave, sick leave, maternity/paternity leave and other leave granted by legislation as a minimum.

The Company does not accept physical or verbal abuse, harassment or bullying in any form.

5. Conflicts of Interest

The trust and confidence of those the Company deals with, including clients, suppliers and employees, is important to its success, and conflicts of interest can undermine these relationships.

Conflicts of interest are managed through the Company’s QP3 Anti-Bribery & Corruption Policy, which provides guidance for staff on avoiding situations that could compromise, or appear to compromise, their judgement. All officers, employees and representatives of the Company are expected to act honestly and within the law.

6. Information and Confidentiality

Information received by employees, contractors or agents of the Company is not used for personal gain, nor for any purpose beyond that for which it was given.

The Company complies with applicable data protection legislation, including the UK GDPR and any successor legislation.

7. Shareholders and Investors

The Company, its officers, employees and representatives aim to ensure that shareholders, creditors and other investors are not knowingly misled by any act or omission within their control.

8. Bribery and Corruption

The Company operates a zero-tolerance approach to bribery and corruption and does not condone bribery or facilitation payments, as defined by the Bribery Act 2010. Employees and associated persons – including agents, subsidiaries and business partners – must not offer, promise, give, request or accept bribes or facilitation payments and are encouraged to report any concerns regarding corruption or bribery.

Where an employee or associated person is unsure how to handle a gift, hospitality offer or any situation that may give rise to a conflict of interest or bribery concern, they should seek guidance from their line manager. The Company has regard to guidance published by the Secretary of State under Section 9 of the Bribery Act 2010.

Further requirements and responsibilities are detailed in QP3 Anti-Bribery & Corruption Policy, which must be complied with by all employees and associated persons.

Breaches of this policy may result in disciplinary action and, where applicable, personal liability under the Act.

9. Related Documents

This policy should be read together with:

- QP13 – Corporate and Social Responsibility Policy
- QP36 – Modern Slavery Policy
- QP3 – Anti-Bribery & Corruption Policy
- Aerospheres Employee Handbook

Signed and Approved:



Paul Thompson – Chief Executive Officer

Date: 7th August 2026