



Ethics • Integrity • Compliance

Responsibility Charter

Date: June 2026



Laxton

Purpose

Laxton commits to ethical business practises that reflect societal values. Our standards apply to all interactions and business activities, and we expect the same from our customers, suppliers, partners, and stakeholders.

Laxton's ethical standards and responsibilities should reflect society's values, and this corporate responsibility charter is intended to reflect Laxton's ethical stance on various matters. It also sets out what is expected from Laxton's customers, suppliers, partners, and stakeholders.

Laxton reserves the right to refuse orders, conduct business with, or terminate agreements with customers, suppliers, partners, and stakeholders who do not adhere to Laxton's position concerning the ethical standards set out herein or who act in contravention of the ethical standards expected of them by Laxton.



Laxton SDG Alignment

Laxton recognises our commitment to the United Nations Sustainable Development Goals (UN SDGs), a set of 17 goals developed by the United Nations in 2015, which provide a blueprint for peace and prosperity for people and the planet. Laxton has identified several UN SDGs which resonate strongly with us and align closely with our operations, partnerships, and supply chain:

8

Decent Work and Economic Growth

12

Responsible Consumption and Production

13

Climate Action

16

Peace, Justice, and Strong Institutions



Commitment to Integrity

All Laxton customers, suppliers, partners, and stakeholders confirm that they have read and understood the terms and conditions outlined in the Laxton Corporate Responsibility Charter and agree to adhere to them. By committing to the principles of this charter, they recognise that any failure to comply constitutes a breach of their contractual obligations, which may result in the termination of their relationship with Laxton, depending on the severity of the breach. Furthermore, they ensure that their own suppliers, subcontractors, partners, and associates also comply with these standards.

This document outlines how Laxton practises integrity with our customers, suppliers, partners, and stakeholders.



Integrity, Ethics, Anti-Bribery, and Anti-Corruption

Laxton is committed to maintaining the highest level of ethics, fairness, and transparency in our interactions with all stakeholders. Laxton will maintain high standards of ethics and will not tolerate bribery or corruption. High standards of ethics and integrity will be promoted at all times.

Fraud, corruption, and unethical behaviour threaten the basic principles of good governance. They destroy reputations, undermine public confidence, and threaten to erode the rule of law. Laxton rejects any form of bribery and corruption and complies fully with all related legislation, including but not limited to the UK Bribery Act of 2010 and the USA Foreign Corrupt Practices Act of 1977.

We prioritise lasting value over short-term gains and act on behalf of the entire company, not just the immediate team or goals. We embrace responsibility and hold ourselves accountable for results.



Zero Tolerance



International Standards



Legislative Compliance



Transparency and Monitoring





Compliance with Laws

Laxton complies with all laws and regulations in each jurisdiction, including those pertaining to Human Rights, Child Labour, Slavery, Money Laundering, Terrorism, Corruption, and Bribery.

Laxton subscribes to and expects all customers, suppliers, partners, and stakeholders to subscribe to practises that promote human rights, dignity, and integrity.



Fair Work Environment

Employee wellbeing is vital. Ensure a safe workplace where employees are paid fairly and are not harassed or overworked. Partners and suppliers are expected to create an employment environment free from physical, psychological, and verbal harassment or any other abusive conduct. Additionally, they must provide their employees with a safe and healthy working environment.

Conflict of Interest

Customers, suppliers, partners, and stakeholders are expected to report any matter that could possibly result in a conflict of interest between them and Laxton. Laxton will not attempt to secure work that conflicts with any work in which any of its customers, suppliers, partners, and stakeholders are involved, and it expects the same from its customers, suppliers, partners, and stakeholders towards Laxton.

Record Keeping

Customers, suppliers, partners, and stakeholders must maintain accurate and complete records of all business agreements and transactions they enter into. Partners and suppliers are expected to create accurate records and must not alter any record entry to conceal or misrepresent the underlying transaction it represents. Laxton retains accurate and complete records for all prescribed legal retention periods.

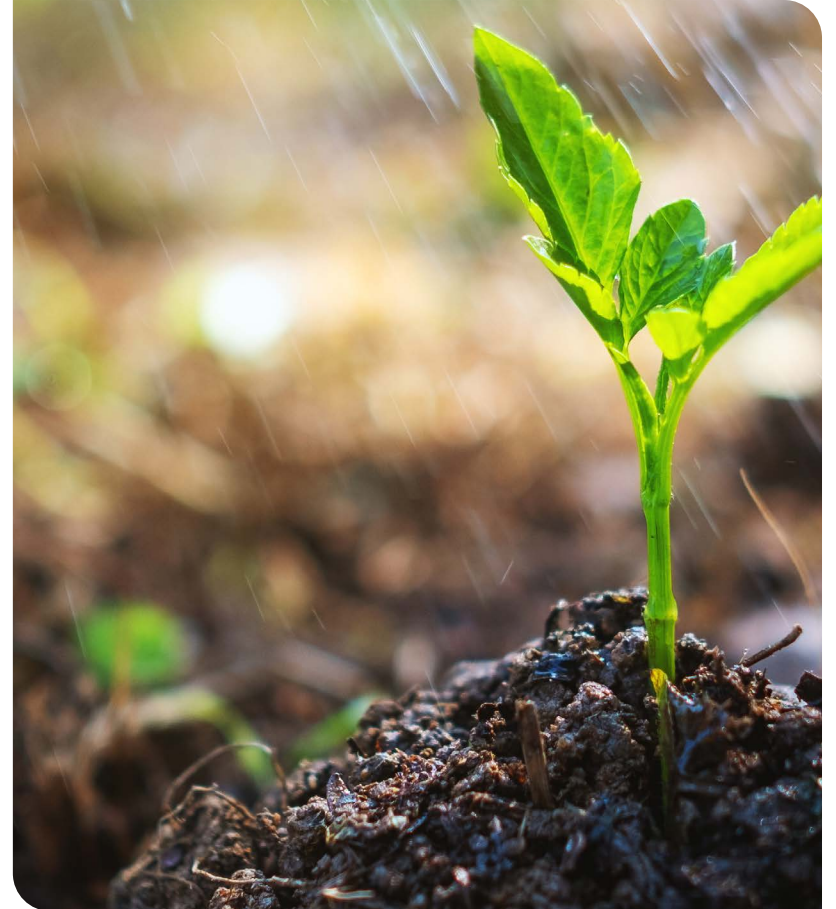


Laxton's Obligations in Relation to Society, the Environment, Health, and Safety

Laxton, along with its partners and suppliers, is committed to implementing all necessary protective measures to prevent potential risks to human or animal health and the environment. Partners and suppliers must ensure the health, safety, and welfare of their employees, contractors, visitors, suppliers, and anyone else affected by their activities within their operating areas.



Laxon limits business impact on the environment, managing and mitigating risks.





Fair Competition

We compete based on the quality of our products, solutions, and services without restricting or harming competition. We support free competition, preventing price fixing, monopolies, and coercion. Customers, suppliers, partners, and stakeholders must avoid unfair practises, refrain from fixing commercial conditions, avoid exploitation, and treat everyone with dignity, integrity, and respect. Maintain fair business, advertising, and competition standards, and do not make deals that unlawfully restrict trade. Additionally, avoid making unfair, misleading, or inaccurate comparisons with competitors' products or services, and do not comment unfairly on their character, financial condition, or possible legal or regulatory issues.

Compliance with Export Controls and Import Laws

Partners and suppliers must provide truthful, accurate, and regularly updated information. They are responsible for applying for and obtaining necessary import/export licenses, permits, and other consents required for exporting or re-exporting products from their country of manufacture.



We strictly adhere to all regulations for export controls and avoid sanctioned countries.



Data Protection

At Laxton, we prioritise protecting sensitive information, including confidential, proprietary, and personal data. Our partners and suppliers must handle this information carefully and comply with all relevant laws and regulations.

- **Confidentiality:** We protect all company and confidential information using strict policies, procedures, and contracts for the identification, use, retention, protection and disclosure of such information, following all applicable laws.
- **Law Compliance:** We fully comply with all Data Protection Laws, including the EU GDPR, the Protection of Personal Information Act, China's Personal Information Protection Law, and the US Privacy Act.
- **Intellectual Property:** Customers, suppliers, partners, and stakeholders must respect and protect our and third-party intellectual property rights (software, patents, designs, etc.). No copying, use, or disclosure without authorisation. The transfer of technology and technical knowledge must be done in a way that protects intellectual property rights.
- **Data Security:** Ensure that data provided by Laxton is secure, used correctly, transported, and destroyed according to our requirements and relevant laws. Data must not be disclosed or used for other purposes without permission.



Anti-Money Laundering

We do not engage in, promote, encourage, or condone money laundering, bribery, or corruption.



Cyber Security

All information and data stored by Laxton are confidential and important to protect. Laxton, its customers, suppliers, partners, and stakeholders are expected to keep all emails and information secure through password protection, antivirus software, and security updates and not leave any devices unattended at any point in time.



Slavery and Fair Labour Practises

We do not engage in, support, or allow any modern slavery practises. We will terminate contracts with any customers, suppliers, partners, or stakeholders found to be involved in modern slavery.



Whistle Blowing

Laxton encourages anyone who commits a breach of this Code of Business Ethics or any law to report the act through the appropriate channels to Laxton's Whistle Blowing Champions.

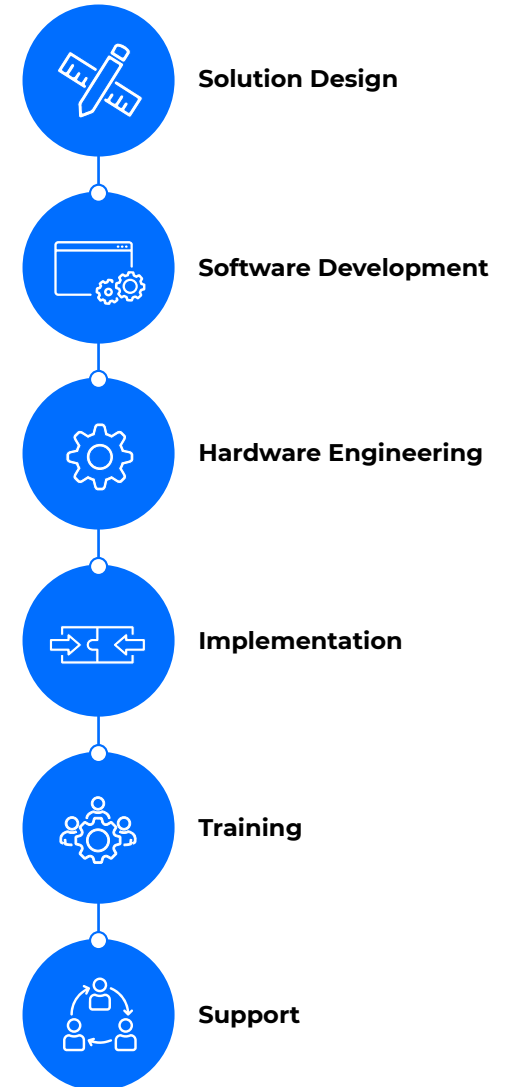
Training

We conduct regular training sessions through our IT department for all employees, customers, suppliers, partners, and stakeholders to communicate our principles. Additionally, we monitor the compliance of our customers, suppliers, partners, and stakeholders with the ethical values outlined in our guidelines.

Vetting Processes

Laxton goes through stringent vetting processes for all customers and suppliers, in which due diligence is performed to ensure that these parties are registered, licensed, compliant, and operate ethically.

- Thorough Checks
- Ongoing Monitoring
- Continuous Improvement
- Product Retrieval





Application Form

This application form is part of the Suppliers and Partners' qualification process. By signing it, the applicant confirms that it complies with all the requirements outlined in this document. The applicant agrees to inform Laxton promptly if there are any changes after the form is signed. This application form is subject to the laws of the country where the Laxton entity conducting the applicant's qualification process is registered.

Document Information

Company Name

Company Registration Number

Authorised Signatory

Name

Title

Date

Signature

Company Stamp