

# Governance

**Senior's Purpose – "We help engineer the transition to a sustainable world for the benefit of all our stakeholders" – articulates our commitment to long-term value creation for our stakeholders. We recognise that effective governance of sustainability-related matters is essential to ensure that decision-making is aligned with the Company's overarching Purpose. Senior's Executive Committee is responsible for the management of sustainability-related matters. The Board of Directors has oversight over such matters through regular updates provided during the scheduled Board meetings on the Group's sustainability performance and initiatives.**

## READ MORE ABOUT:

- Anti-bribery & Corruption on page 90
- Agents Policy on page 90
- Gifts and Hospitality Policy on page 90
- Whistle-blowing on page 90
- Human Rights and Modern Slavery on page 90
- Responsible Sourcing on page 90
- Cybersecurity and data protection on page 91
- International Trade Compliance on page 91

## Uphold high standards of ethical integrity

Senior's Code of Conduct (the Code), updated in 2021 and available on the Company's website, plays an important role in supporting the Value of Integrity within the Group. It contains work-related scenarios, together with a selection of questions and answers, to help employees to understand the Code and relate it to their individual roles and working environment. The Code provides a clear framework on which to base decisions when conducting day-to-day business. It does this by:

- clearly setting out the behaviour expected of all employees;
- providing guidelines which help employees to apply our Values; and
- enabling employees to raise a concern or ask a question if in doubt.

In July 2021, all employees were issued with a personal copy of the Group's updated Code of Conduct booklet and provided with training on the revised Code. All new joiners are issued with a copy of the booklet and provided with training on the Code. The Code of Conduct booklet is available in all languages applicable to the Group's employees. A compulsory 2023 Global Code of Conduct online training course was rolled out across the Group to all employees during the year. Further details of the training modules contained within the 2023 course can be found on page 96. All employees and Directors were required to achieve a Pass grade, as a minimum. In 2023, 95% of employees completed the annual Code of Conduct training allowing for new starters who have not completed their training immediately on joining.

In 2023, the Group Chief Executive Officer, the Group Finance Director and other members of the Executive Committee visited the Group's operating businesses as part of the Employee Roadshow. The Roadshow was an effective way of communicating directly with the Group's employees, providing them with updates on the Group's performance and strategy. The Executive Leadership team also used the Roadshow to reinforce the Code and the importance of maintaining an absolute commitment to the highest possible standards of ethics and a zero tolerance towards bribery and corruption.

The Company conducts annual Control Self Assessments, encompassing questions related to the Code, across all operating businesses. These are further supported by internal audits, which test, among other matters, compliance with sections of the Code and the prominent display of the Group's whistle-blowing procedures at all operating businesses. In addition, risk assessments considering areas of the Code, are conducted at operating business and Group levels. Through its assurance programme, the Board is able to ensure that employees receive mandatory training and that the Group's operating businesses uphold high standards of ethical integrity. All alleged violations or complaints are investigated, and any remedial actions are taken as necessary. Any fraud issues that have come to the attention of the Director of Risk and Assurance are discussed by the Audit Committee, noting the cause, the actions taken and any improvements to internal controls implemented as a result.

Operating with integrity and in an ethical manner builds trust and strengthens long-term relationships with customers and other stakeholders, underpinning the Board's strategic objectives and protecting the Group's reputation.

## Responsible Taxation

Senior's "Approach to Tax", which can be found on the Company's website, is aligned with the principles set out in the Code, which underpins the way we go about our day-to-day business across the Group and places integrity and ethical behaviour at the heart of what we do. Once a year, the Board of Directors approves the Group's tax strategy.

## Product safety

Product quality is absolutely core in all of Senior's operating businesses and activities. All of Senior's businesses have ISO 9001 accreditation for manufacturing. The operating businesses have additional aerospace and automotive accreditations, dependent upon their intended markets. Ultimate responsibility for product quality and safety lies with the senior manager of each business unit.

All products undergo service/safety risk assessments, as required in Senior's demanding markets. Employees receive regular training on product and service safety. All the Group's operating businesses have in place incident investigation and corrective action policies and procedures and quality testing programmes.

Product/service objectives or targets are set by the operating businesses to meet customer requirements and regular external product/service safety audits are conducted, where standards require.

## ADDITIONAL RESOURCES

[www.seniorplc.com/sustainability.aspx](http://www.seniorplc.com/sustainability.aspx)