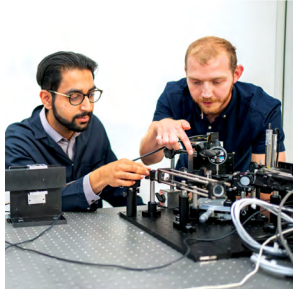




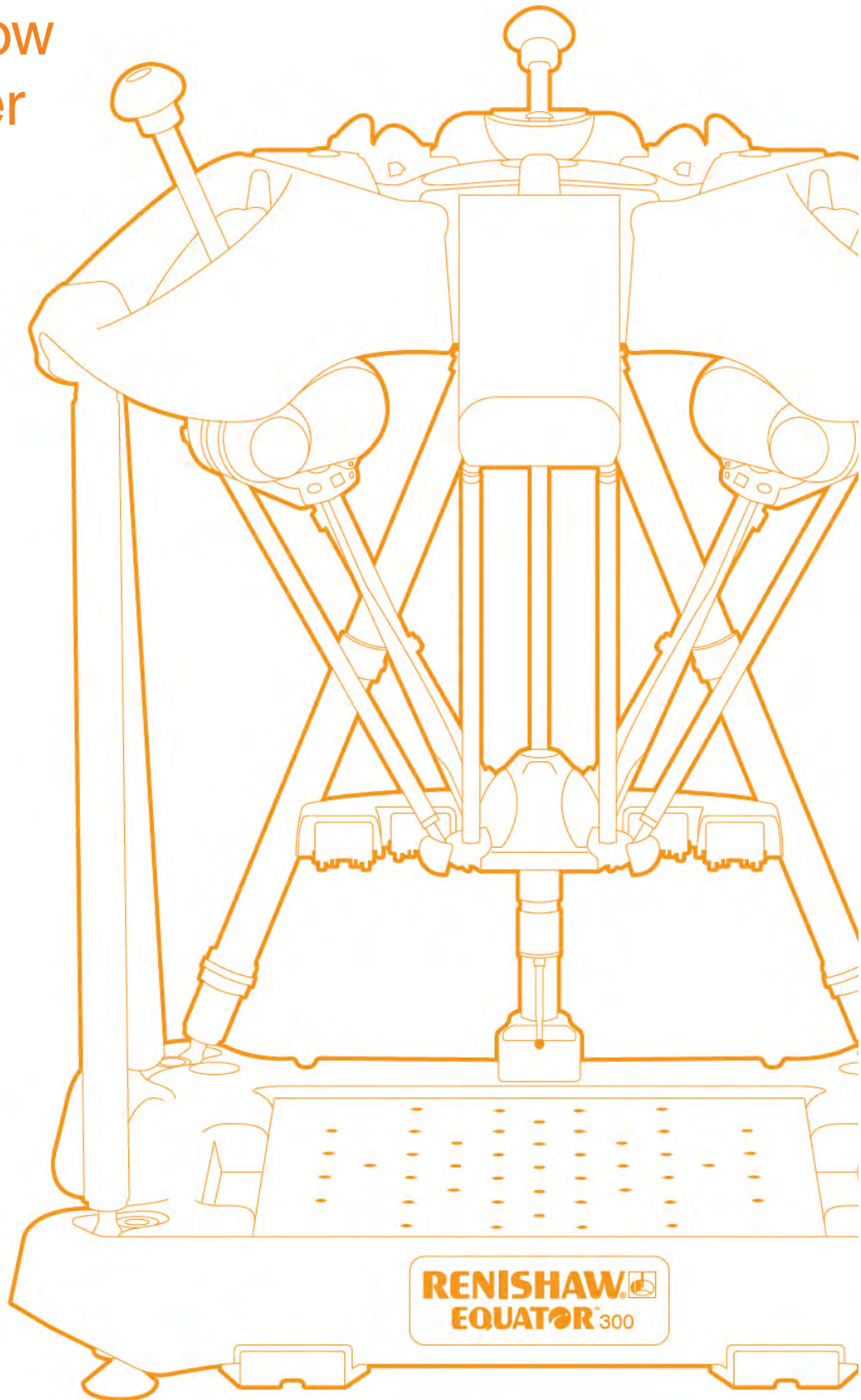
Doing business  
**responsibly** 



**Renishaw**  
**Code of Conduct**



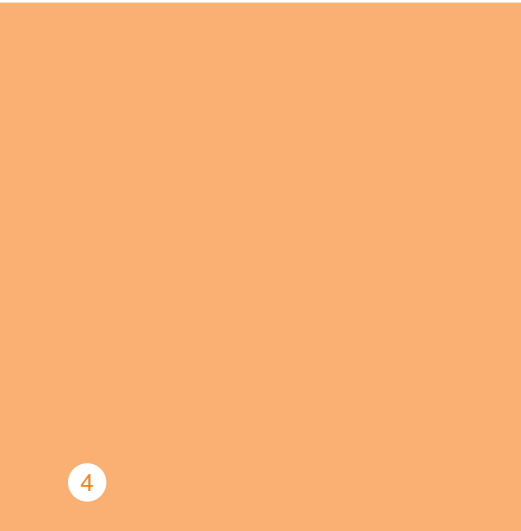
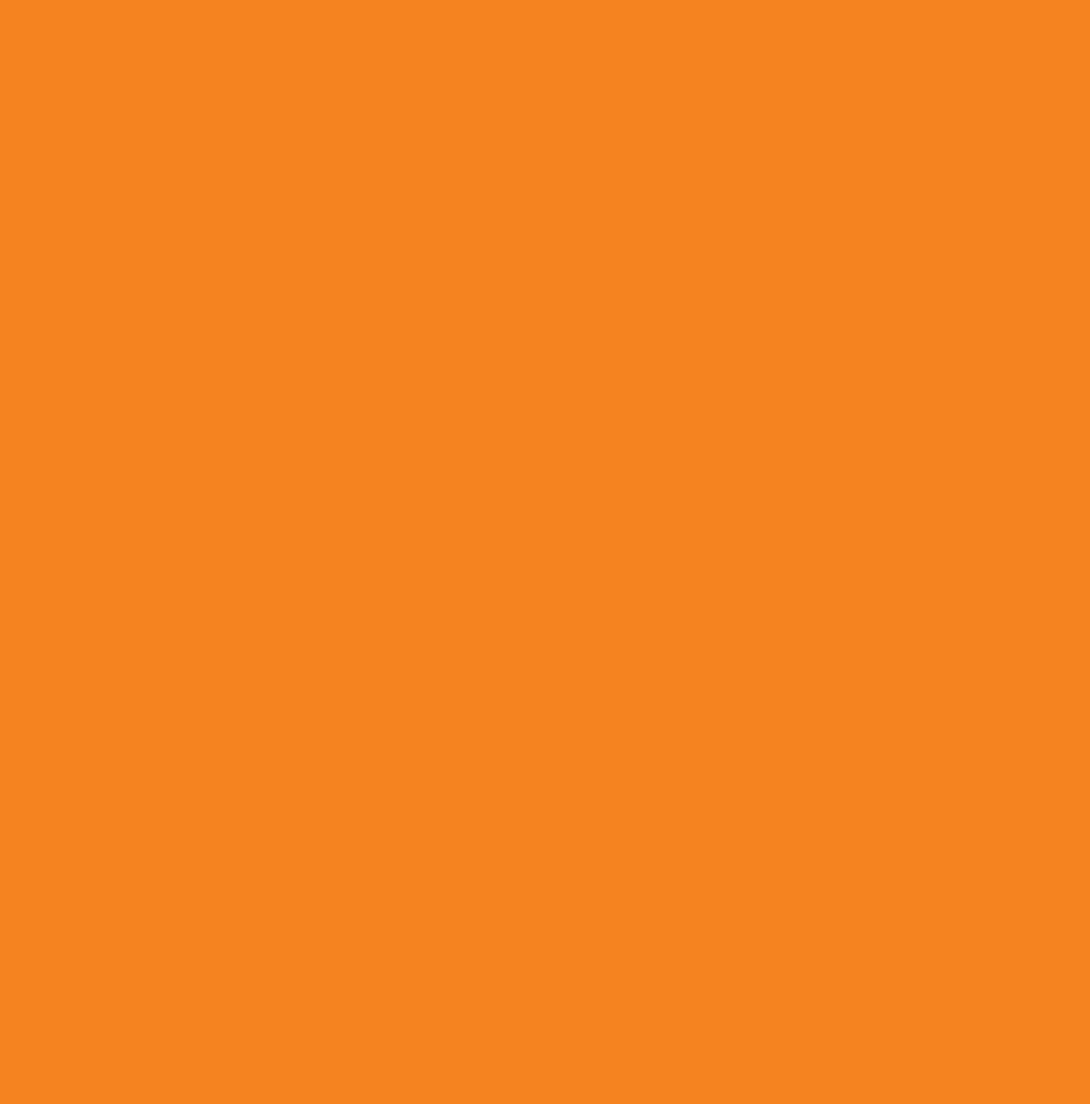
# Transforming Tomorrow Together



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# A message from Will Lee, Chief Executive

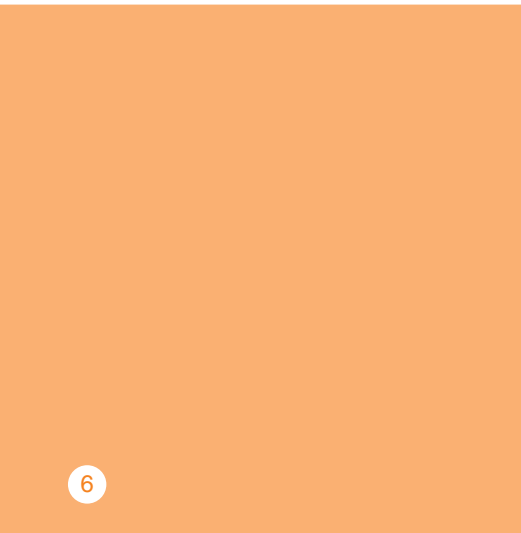
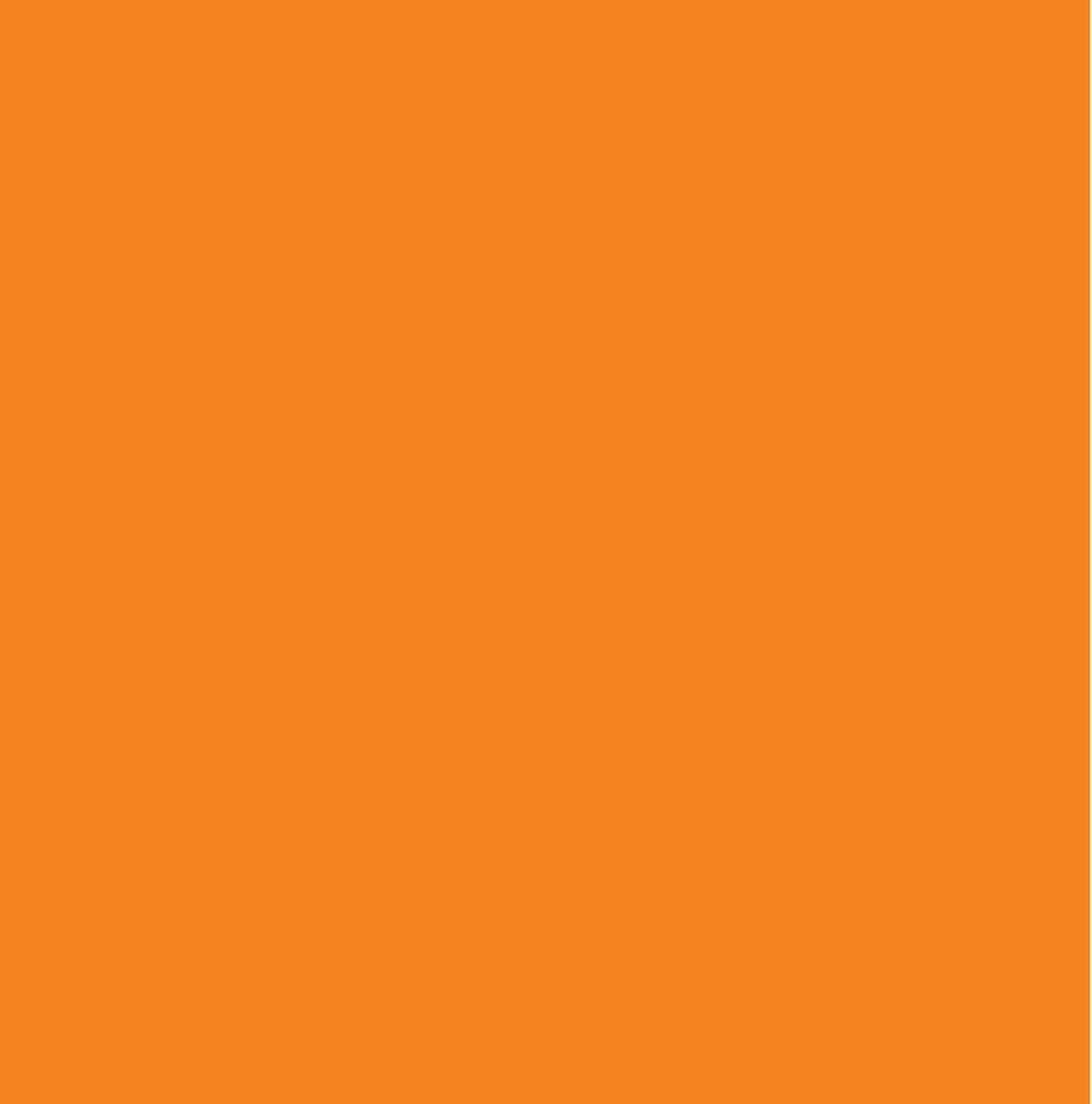
For over fifty years, Renishaw has been at the forefront of the metrology industry. We make it possible for manufacturers to create the products, materials, and therapies that define our world and touch billions of lives every day. From contributing to the magic of flight to supporting awe inspiring medical sciences, we are proud of the work we do.

However, we are even more proud of how we do it. At Renishaw, we believe in **doing business responsibly**. Through a strong working culture, we encourage every member of our team to act in ways that are in line with our core values of innovation, inspiration, integrity and involvement. Our Code of Conduct ('Code') provides guidance on how to do just that.

Read our Code, refer to it often, and live it in your daily work. It will not only help you make good decisions, but it will also encourage you to Speak Up if you see or experience anything that might violate the law, our policies, or our overall sense of what's right. If you have any questions, look to the 'Learn more' and 'Who to contact' sections throughout the document.

Thank you for all you do for Renishaw to realise our purpose of Transforming Tomorrow Together, whether as an employee, customer, supplier, member of our community, or investor. Together, we'll continue to innovate and transform capabilities in both manufacturing and healthcare and, more importantly, we will do so responsibly.

**Will Lee**  
Chief Executive





# Our values

At Renishaw, we are proud of our strong working culture, and we encourage our people to act in line with our core values of innovation, inspiration, integrity, and involvement.

## Innovation

We encourage everyone to be innovative and challenge convention.



## Inspiration

We will aim to inspire each other, our customers, and other people we work with outside of the business.



## Integrity

We will act with integrity at all times.



## Involvement

We encourage everyone to be fully involved and to support each other in contributing to the success of our business and the communities in which we operate.



# Our Code

## Overview

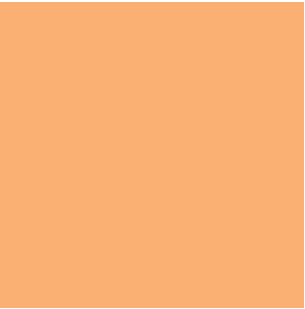
What does it mean to do business responsibly? At Renishaw, it means to innovate and inspire while recognising the impact we have on our stakeholders, planet and communities. Central to everything we do is our purpose of Transforming Tomorrow Together – both through our products and services and through our actions and interactions.

In all that you do, make decisions that reflect who we are and what we [value](#) as a Company. In many situations, the right thing to do may be clear, but we understand that work can be complicated – and so can the laws and rules that apply to us. Sometimes it can be hard to know what to do or where to go for help.

Our Code of Conduct ('Code') is an important resource to help you make good decisions. It is designed with you in mind and will help you to:

- › Comply with applicable laws, regulations, and Company policies.
- › Promote integrity and the highest standards of ethical conduct.
- › Address common ethical situations you could encounter in your work.
- › Avoid even the appearance of anything improper in our Company's business activities.

Please note that there may be links to internal pages throughout the document.



## Complying with laws and regulations

Renishaw is committed to complying with all laws, rules, and regulations that apply to our business. It is impossible to anticipate every question you may have or situation you might face so, in addition to the Code, Renishaw also has other resources to help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgement and to seek help when you need it.

We operate in multiple countries, so it's important to be aware of different laws and customs that may apply. While we respect the norms of our customers, business partners, and coworkers throughout the world, all employees must, at a minimum, comply with the standards and principles in this Code. If you have any questions about any provisions of our Code conflicting with a local law or requirement, you should seek further guidance from your local legal team. Where necessary, Renishaw uses external legal counsel to support its compliance requirements and provide specialist advice.

### Who to contact



Your local legal team, or [legal@renishaw.com](mailto:legal@renishaw.com)



## Who must follow this Code

All employees of Renishaw, including executives and temporary employees, plus non-executive directors are required to read, understand, and follow our Code.

Consultants, contractors, agents, distributors, channel partners, and suppliers ('business partners') who serve as an extension of Renishaw are also expected to follow our Code, as well as any applicable contractual provisions.

If you supervise our business partners, you are responsible for communicating our standards and ensuring that they are understood. If a business partner fails to meet our ethics and compliance expectations, or their related contractual obligations, Renishaw reserves the right to terminate their contract or refuse to do further business with them.

## Accountability

Violating our Code, our policies, or the law, or encouraging others to do so, exposes our Company to liability and puts our reputation at risk.

Anyone who violates our Code will be subject to disciplinary action, which may include termination of their employment. You should also understand that violations of laws or regulations may also result in personal legal proceedings and penalties including, in some circumstances, personal criminal prosecution. If you see or suspect a violation, please report it.

---

### Learn more

» [Group Speak Up Policy](#)

### Who to contact



Your manager, or [HR@renishaw.com](mailto:HR@renishaw.com)



Speak Up

# Responsibilities

Each of us has an obligation to act with integrity, even when this means making difficult choices. Meeting this obligation is what enables us to succeed and grow.

## Employee responsibilities

Every employee has a responsibility to:

- › Act in a professional, honest, and ethical manner.
- › Read the Code and any Company policies applicable to their role.
- › Complete all required training and keep up to date on current standards and expectations.
- › Report concerns about possible violations of our Code, our policies, or the law.
- › Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records.

## Additional responsibilities of managers

Managers have the additional responsibility to:

- › Lead by example and demonstrate high standards of ethical business conduct.
- › Help create an inclusive environment that values mutual respect, open communication, and promotes involvement.
- › Be a resource for others. Communicate often with employees and business partners about the Code and other policies.
- › Respond quickly and effectively. When a concern is raised, treat it seriously and with due respect for everyone involved.
- › Be aware of the limits of your authority and don't take actions that exceed this. If you are unsure of the appropriate action, discuss this with your manager.

## Business partners' responsibilities

Renishaw expects its business partners to:

- › Uphold high standards of ethical conduct with Renishaw and other third parties.
- › Understand and adhere to the principles of the Code of Conduct, or the business partner's equivalent code (including the principles regarding privacy, anti-bribery, anti-corruption, anti-facilitation of tax evasion, fair competition, sanctions, trade controls and the prevention of financial crime). Business partners must have in place appropriate controls to manage these risks.
- › Respect and protect Renishaw's brand, reputation, information and assets.



---

## What if?

**I'm a manager and my obligations are not clear if someone comes to me with an accusation. What if it involves a senior manager?**

No matter who the allegation involves, you must report it.

---

**I observed misconduct in an area not under my supervision. Am I still required to report this?**

The best approach is to talk first with the manager who oversees the area where the problem is occurring, but if this isn't feasible or effective, you should contact your local legal team or HR representative or report it via the Speak Up portal.

### Who to contact



Your manager, or [HR@renishaw.com](mailto:HR@renishaw.com)



Speak Up

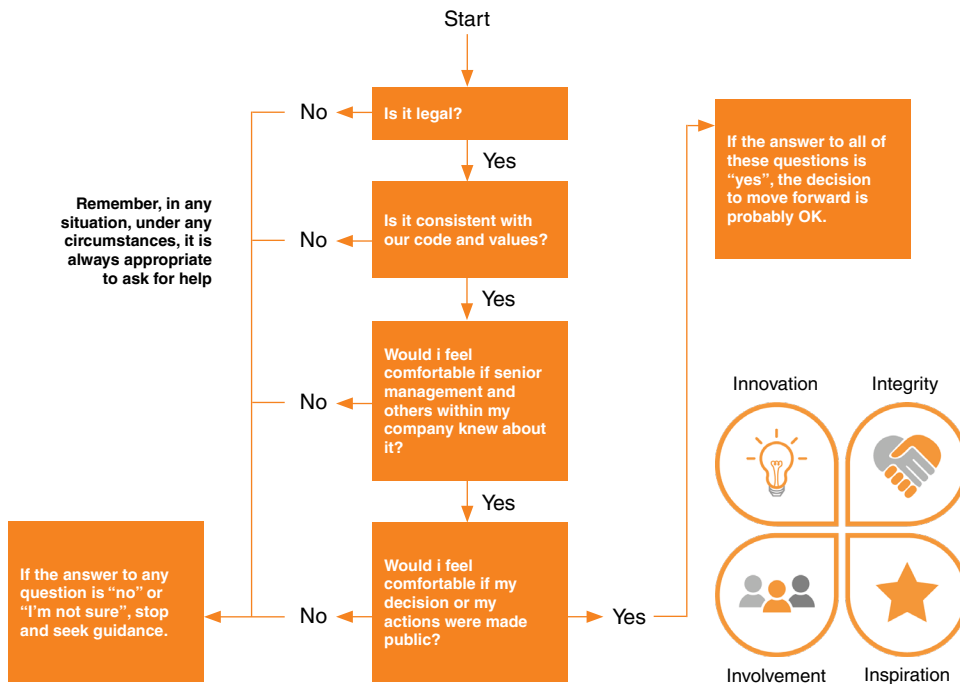


## Making good decisions

Making the right decision is not always easy. There may be times when you'll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you're not alone. There are resources available to help you.

### Facing a difficult decision?

It may help to ask yourself...



### One more thing...

We value your feedback. If you have suggestions for ways to enhance our Code, our policies, or our resources to better address a particular issue you have encountered, please bring them forward. We all have a shared responsibility to ensure that Renishaw does business responsibly.

#### Who to contact



[communications@renishaw.com](mailto:communications@renishaw.com)

## Speak Up

If you see or suspect any violation of our Code, our policies, or the law or if you have a question about what to do, you should talk to either:

- > Your manager,
- > Your HR business partner, or
- > A member of your legal team

If there is an issue which you feel to be unfair or unwarranted, you can use your local grievance procedure to address this.

If it is a serious concern or you don't feel comfortable speaking with the colleagues listed above, or using the grievance procedure, you can use the [Speak Up](#) portal.

Renishaw will ensure that your concerns are investigated and addressed appropriately. All reports received will be treated equally, whether they are submitted anonymously or not. It is important to note that if you do raise an anonymous report, this can make it harder, or even impossible, to investigate the matter.

### What is the Speak Up portal?

The Speak Up portal allows you to confidentially report a concern in two ways:

**Option 1** – By email – [speakup@renishaw.com](mailto:speakup@renishaw.com)

**Option 2** – To our independent reporting service – [renishaw.ethicspoint.com](https://renishaw.ethicspoint.com)

You can make a report (anonymously if you wish, and where local law allows) using a freephone number or through the online form 24 hours a day, 7 days a week, 365 days a year. Other options may be available in your region where required by law.



**Report a concern  
online**



**Report a concern  
by phone**



**Follow-up on a  
report**

### Who to contact



Your manager, or [speakup@renishaw.com](mailto:speakup@renishaw.com)



**Speak Up**



### What to expect when you use the Speak Up portal

- » After you make a report, you will receive an identification number so you can follow up on your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation.
- » An investigator is assigned to your report. In some cases, we may appoint a team of investigators, including appropriate employees with relevant experience or specialist knowledge of the subject matter.
- » The investigation is conducted. In all cases, we aim to keep you informed of the progress and its likely timescale. You must treat any information about the investigation as strictly confidential. Any report you make will be kept confidential by all individuals involved with reviewing and investigating it.
- » You will be informed of the conclusion. You will only be told that your report was either substantiated, partially substantiated, or not substantiated. You may not be provided with any further details regarding any outcomes.

**Remember, an issue cannot be addressed unless it is brought to someone's attention.**

---

### What if?

**I suspect there may be some unethical behaviour in my business unit involving my manager. I know I should report my suspicions, and I'm thinking about using the Speak Up portal, but I'm concerned about retaliation.**

You are required to report misconduct and, in your situation, using the Speak Up portal is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.

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### Learn more

- » [Group Speak Up Policy](#)
- » [Local Grievance Policy or Procedure](#)

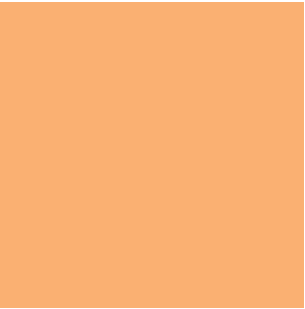
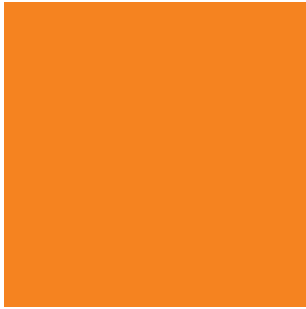
# Our conduct in the workplace

## Equality, diversity and inclusion

Renishaw helps bring together employees with a wide variety of backgrounds, skills, and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

Our colleagues, job applicants, and business partners are entitled to respect. We are committed to ensuring that they feel welcomed and valued and that they are given opportunities to grow, contribute, and develop with us. To uphold that commitment, we support laws prohibiting discrimination and provide equal opportunity for employment, income, and advancement.

We base employment decisions solely on qualifications, achievements, demonstrated skills, and job knowledge and never on age, disability, gender reassignment, marital status, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.



---

## Do the right thing

- » Treat others respectfully and professionally.
- » Do not discriminate against anyone – this includes not discriminating against characteristics protected by law or Company policy but covers any type of discrimination.

---

## Watch out for

- » Comments, ‘banter’, jokes, or materials, including emails and instant messages (for example, Teams, WhatsApp), which others might consider offensive.
- » Bias, including unconscious bias, when judging others. If you supervise others, judge them on performance. Use objective, quantifiable standards and avoid introducing unrelated considerations into your decisions.

---

## What if?

**One of my co-workers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?**

Sending these kinds of jokes violates our values as well as our policies that relate to the use of email and our standards on diversity, harassment, and discrimination. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode the team environment that we have all worked to create. If you feel comfortable, you should raise this with them directly. If you don’t feel comfortable to do so or the behaviour continues, you should notify someone from the ‘Who to contact?’ section as soon as possible.

---

## Learn more

- » [Group Equality Diversity and Inclusion Policy](#)

### Who to contact



[HR@renishaw.com](mailto:HR@renishaw.com) or [diversity@renishaw.com](mailto:diversity@renishaw.com)

## Harassment-free workplace

We all have the right to work in an environment that is free from intimidation, harassment, bullying, and abusive conduct. Verbal or physical conduct by any employee that harasses another, disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

### Sexual harassment

**One form of harassment is sexual harassment, which in general occurs when:**

- » Actions that are unwelcome, are made a condition of employment, or used as the basis for employment decisions. This could include a request for a date, a sexual favour, or other similar conduct of a sexual nature.
- » An intimidating, offensive, or hostile environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behaviour of a sexual nature.

---

### Do the right thing

- » Promote a positive attitude towards policies designed to build a safe, ethical, inclusive and professional workplace.
- » Help each other by speaking out when a co-worker's conduct makes others uncomfortable.
- » Demonstrate professionalism: for example, do not visit inappropriate internet sites or display sexually explicit or offensive pictures in the workplace or during office hours, and when travelling for business do not visit adult entertainment venues.
- » Report all incidents of harassment and intimidation.

---

### Watch out for

- » Sexual or offensive jokes or comments (explicit, or by innuendo) and leering.
- » Verbal abuse, threats, or taunting.
- » Threatening remarks, obscene phone calls, stalking, or any other form of verbal or physical harassment.
- » The display of sexually explicit or offensive pictures or other materials.

---

## What if?

**While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. We weren't in the office and it was after regular working hours, so I wasn't sure what I should do. Was that harassment?**

Yes, it was. This type of conduct is not tolerated, not only during working hours but in all work-related situations, including business trips. Tell your colleague such actions are inappropriate and must be stopped, and if they continue, report the problem to the appropriate contact below.

---

**I frequently hear a colleague making derogatory comments to another co-worker. These comments make me feel uncomfortable, but I feel like it's none of my business, and the person they're directed at will Speak Up if they are offended. Should I ignore this?**

No, you shouldn't. It's up to each of us to help maintain a work environment where people feel welcomed, valued, and included. Since you're aware of this situation, you have a responsibility to Speak Up about it. If you feel you can, speak to your colleague and ask that this behaviour stop. If you feel you can't or the comments continue, talk to your manager, HR Business Partner, or use the Speak Up portal.

---


## Learn more

- » [Your local grievance policy or procedure](#)
- » [Employee Assistance Programme \(EAP\)](#)

### Who to contact



Your manager, or [HR@renishaw.com](mailto:HR@renishaw.com)

 Speak Up

## Health and safety

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. No matter what job you do or where you do it, we count on every employee to actively promote a safe and healthy workplace, and report any situations that may pose a health, safety, or security risk.

Reporting risks and hazards is not just the right thing to do, it's a requirement, because a failure to Speak Up about an incident, or to participate in an incident investigation, can have serious consequences. Do your part to keep everyone in the Renishaw community injury-free by reporting incidents, near misses and or accidents.

### Alcohol and drugs

#### While at work.

- » Do not use, possess, or be under the influence of illegal drugs or any substance that could interfere with a safe and effective work environment or harm our Company's reputation.
- » You should always be ready and able to carry out your work duties.

### Personal protective equipment

**The Personal Protective Equipment at Work Regulations (PPE) place duties on employers to take reasonable steps to ensure that PPE provided is properly used. PPE must be worn and used in accordance with the instructions and training provided:**

- » Employees must take all reasonable steps to ensure that PPE is returned to the rightful place after it has been used.
- » All PPE must be examined before use.
- » Any loss or obvious defect must be immediately reported to their manager.

---

## Do the right thing

- » Follow the safety, security, and health rules and practices that apply to your job.
- » Maintain a neat, safe working environment by keeping workstations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.
- » Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to the health or safety of a person or damage the working environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- » Cooperate with any investigations into incidents.
- » Ensure you are aware and familiar with the Group Occupational Health and Safety Policy.

---

## What if?

**I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.**

Discuss your concerns with your manager or local health and safety representative. There may be very good reasons for the practices, but it's important to remember that raising a concern about safety does not make you a troublemaker, but a responsible employee concerned about the safety of others.

---

**A subcontractor commits a violation of our standards. Are subcontractors expected to follow the same health, safety, and security policies and procedures as employees?**

Yes. Managers are responsible for ensuring that subcontractors and other business partners on Renishaw premises understand and comply with all applicable laws and regulations governing the particular facility, as well as with additional requirements our Company may impose.

---

## Learn more

- » [Group Occupational Health and Safety Policy](#)

### Who to contact



Local health and safety representative or  
[healthandsafetyteam@renishaw.com](mailto:healthandsafetyteam@renishaw.com)



Speak Up

# Our information and assets

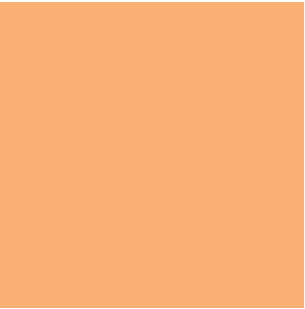
## Company assets

Each of us is entrusted with Company assets – the resources Renishaw owns (whether physical or electronic) that enable us to operate. We are personally responsible for using them with care and protecting them from fraud, waste, and abuse. Personal use of Company assets is prohibited in some countries and discouraged elsewhere, but where permitted, should be kept to a minimum and have no adverse effect on productivity and the work environment.

### Physical and electronic assets

Physical assets include Renishaw facilities, company vehicles, machinery, materials, and office equipment. Electronic assets include computers, mobile phones, IT systems, software, and hardware. Files and records can be both physical and electronic assets, and we have a responsibility to ensure their confidentiality, security, and integrity.

Be aware of our Privacy Notice and Acceptable Use Policy in relation to our monitoring of the use of Company assets.





---

## Do the right thing

- » Lock your workstation when you step away, and shut down when you complete your work for the day.
- » Use Company assets to carry out your job responsibilities, never for activities that are improper or illegal.
- » Immediately report any suspected breach of security of Renishaw assets.
- » Observe good physical security practices to prevent unauthorised access to our premises and assets.
- » Be a good steward of our electronic resources and systems, and practice good cybersecurity.
- » Do not share passwords or allow other people, including friends and family, to use Renishaw resources.
- » Only use software that has been properly licenced and approved. The copying or use of unlicensed or 'pirated' software on Company computers or other equipment is strictly prohibited.
- » Beware of phishing attempts – use caution in opening external emails, email attachments, clicking on suspicious links, or acting on instructions from unverified contacts.
- » Encrypt files containing confidential information.

---

## Watch out for

- » Requests to borrow or use Renishaw equipment without approval.
- » Excessive use of Renishaw resources for personal purposes.
- » Unknown individuals without proper credentials entering our facilities.
- » Unexpected communications from unverified contacts.

---

## Learn more

- » [Acceptable Use Policy](#)
- » [Cyber Security Page](#)
- » [Information Security Statement](#)
- » [Phishing Page](#)
- » [Privacy Notice](#)

### Who to contact



[helpdesk@renishaw.com](mailto:helpdesk@renishaw.com)

## Personal information

Renishaw respects the privacy rights of all individuals and is committed to using personal information in accordance with applicable global privacy laws. We are all responsible for respecting the privacy and protecting the personal information of all customers, suppliers, partners, colleagues, and other individuals.

### Examples of personal information include:

- » Contact details, job titles, employee numbers and operator IDs.
- » Employment information such as salary, appraisals, sickness, and disciplinary information.
- » Payment information such as bank account and credit card details.

---

### Do the right thing

- » Don't collect more personal information than you need, or retain it for longer than necessary.
- » Immediately report any actual or potential breach using the designated email address: [dataprotection@renishaw.com](mailto:dataprotection@renishaw.com)
- » Be transparent about the way you will use personal information that you collect by using privacy notices.
- » Never download, extract, or use personal information obtained in your role for your own purposes or those of a future employer.
- » Ensure that we are legally entitled to process personal information for our purposes.
- » Keep personal information up-to-date or enable individuals to update their own information.
- » Keep personal information secure and only share it with those with a genuine need to know.

## Watch out for

- » Potential transfers of personal information to or allowing access from another jurisdiction.
- » New or changed processes that could impact privacy rights.
- » Third parties who are processing personal information on our behalf – contact the Privacy team for required contract terms and appropriate due diligence.
- » Actions that could inadvertently expose personal information to unintended recipients.

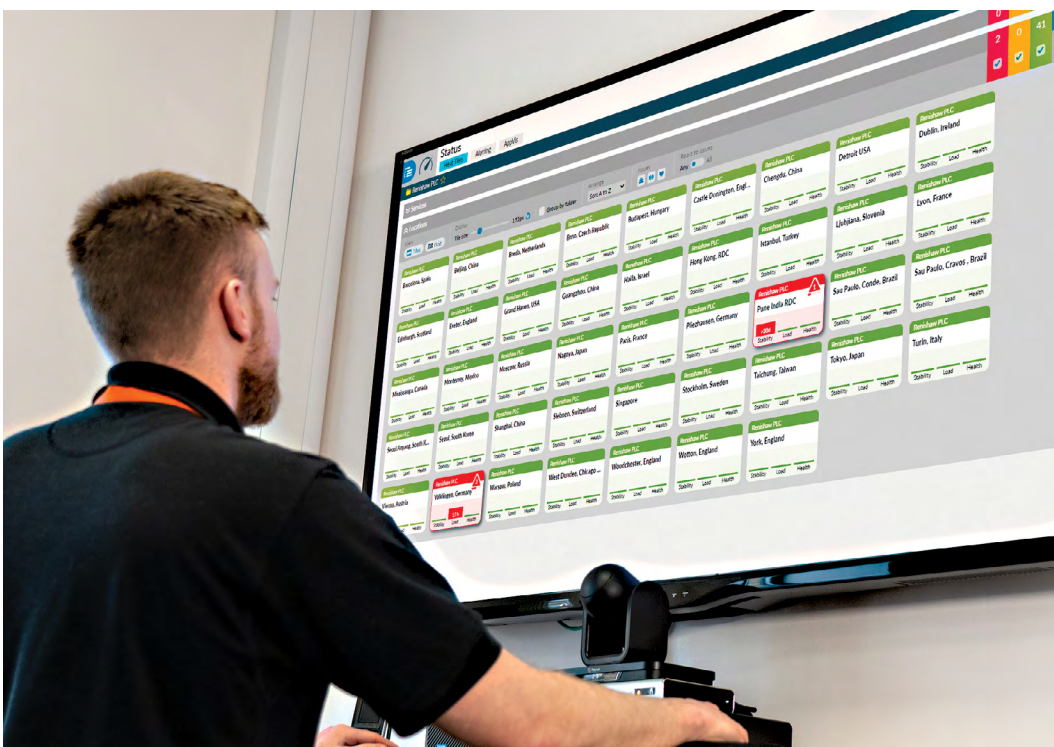
## Learn more

- » [Privacy Policy](#)
- » [Internal Privacy Notice](#)
- » [Personal Information Handling Guidelines](#)
- » [Marketing Data Policy](#)
- » [Digital Marketing Procedures](#)
- » [Data Protection for Developers](#)
- » [Securing Personal Information](#)

## Who to contact



[dataprotection@renishaw.com](mailto:dataprotection@renishaw.com)



## Intellectual property (IP) and confidential information

Renishaw's IP is one of its core assets and Renishaw commits substantial resources to innovation. Employees have an obligation to: (i) disclose inventions during the course of their employment, (ii) ensure that IP rights are appropriately protected, and (iii) that Renishaw has the requisite rights to use any third-party IP.

You must keep confidential information safe and secure. Renishaw relies on each of us to protect confidential information belonging to the Company and others. This includes keeping information secure, limiting access to those who have a 'need to know', and only using it for lawful, authorised purposes.

Be aware that your obligations to restrict your use of Renishaw (and any third-party) confidential information, and respect Renishaw IP, continues even after your employment ends.

Our customers and business partners place their trust in us. We must protect their confidential information and respect their IP just as we protect and respect our own Company assets.

### Examples of IP rights and materials which may contain confidential

#### IP

- » Patents
- » Trade marks
- » Copyright
- » Designs
- » Systems, software, and technology

#### Confidential information

- » Business and marketing plans and formulae
- » Company initiatives (existing, planned, proposed, or developing)
- » Customer lists and details of contacts
- » Pricing and commercially sensitive data
- » Trade secrets, know-how, and inventions

---

## Do the right thing

### IP

- » Promptly disclose to the Company any inventions or other IP that you create.
- » Follow the company policy on identifying, protecting and respecting IP.
- » Always respect third parties' valid IP rights.
- » Immediately bring to the attention of Group Patents or Group Legal any actual or suspected infringement of Renishaw or third party IP rights.

### Confidential information

- » Agree a non-disclosure agreement with third parties before disclosing any information which is not in the public domain.
- » Mark documents as confidential where practicable and indicate how the document should be handled, distributed, and destroyed.
- » Use and disclose confidential information only on a 'need to know basis' and only for the purpose for which it was disclosed.
- » Immediately report any loss or theft of confidential information to Group Legal.
- » Only store or communicate Company information using Renishaw systems. Never download, extract, or use confidential information for your own purposes or those of a future employer.

---

## Watch out for

### IP

- » Always remember, when it comes to IP: 'identify, protect and respect'.

### Confidential information

- » Discussions about confidential information in places where others might be able to overhear – for example when working from home, or in public spaces.
- » Make sure you shred or securely dispose of confidential information when required under contract, or otherwise when it is no longer required to be retained.

---


## Learn more

- » [Group IP Policy](#)
- » [Confidential Data Policy](#)

### Who to contact



[patents@renishaw.com](mailto:patents@renishaw.com), or [legal@renishaw.com](mailto:legal@renishaw.com)

 **Speak Up**

## Records management

The accuracy and completeness of our disclosures and business records are essential to making informed decisions and supporting investors, regulators, and other stakeholders. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area, but all of us contribute to the process of recording business results or maintaining records. Ensure that the information we record is accurate, timely, complete, and maintained in a manner that is consistent with our internal controls, disclosure controls, and legal obligations.

### Records retention

Documents should only be disposed of in compliance with Renishaw policies. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation, lawsuit or audit.

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### Do the right thing

- » Create business records that accurately reflect the truth. Be guided by the principles of transparency and truthfulness.
- » Write carefully in all of your business communications. Write as though someday the records you create may become public documents.

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### Watch out for

- » Records that are not clear and complete or that obscure the true nature of any action.
- » Undisclosed or unrecorded funds, assets, or liabilities.
- » Improper destruction of documents.

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### Learn more

- » [Group Manual](#)

### Who to contact



[HR@renishaw.com](mailto:HR@renishaw.com), or [quality@renishaw.com](mailto:quality@renishaw.com)



Speak Up

## Responsible communications

Renishaw is committed to maintaining honest, inclusive, professional, and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public. For this reason, each of us must help the Company ensure that only authorised persons speak on behalf of Renishaw. This is especially true for communications with the financial media, investors, investment analysts, and other members of the financial community.

### Full, fair, and timely disclosures

Renishaw is committed to meeting its obligations of full, fair, and timely disclosure in all reports and documents that describe our business and financial results, and other public communications.

---

### Watch out for

- » Giving public speeches or writing articles for public communications that relate to Renishaw without approval from a senior manager (if there is any doubt then refer to the Communications Team).
- » The temptation to use your title or affiliation outside of your work for Renishaw without it being clear that the use is for identification only.
- » Invitations to speak “off the record” to journalists or analysts who ask you for information about Renishaw or its customers or business partners.

Be careful when writing communications that might be published online. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of Renishaw.

If you believe a false statement about our Company has been posted, do not post or share non-public information, even if your intent is to “set the record straight”. Your posting might be misinterpreted, start false rumours, or may be inaccurate or misleading.

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### Learn more

- » [Group Social Media Policy](#)

### Who to contact



[communications@renishaw.com](mailto:communications@renishaw.com)

# Our business practices

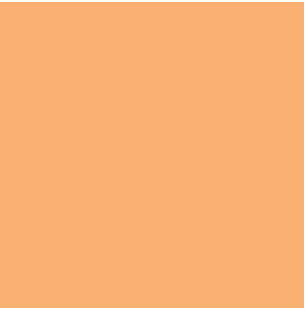
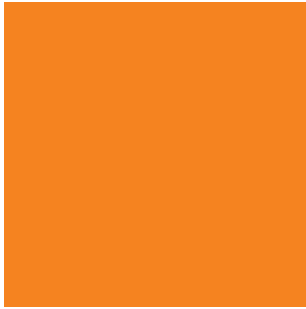
## Product quality, safety, and stewardship

We are dedicated to earning and maintaining the trust of our customers by ensuring the quality, safety, and performance of our products and services. Each of us, as well as our business partners, are expected to meet all quality and safety specifications and our customers' expectations.

---

### Do the right thing

- » Adhere to the highest standards and never take shortcuts or make exceptions that could compromise the quality or safety of our products, service offering or internal processes.
- » Do your part to ensure complete and accurate quality testing and performance reporting of our products and internal processes.
- » Comply with equipment and process checking routines to ensure they conform to specification and expectations.
- » Seek to continually improve how internal processes operate and contribute to product and service performance and delivery.
- » If you believe there is an issue that might have an impact on customer quality, report it to your manager immediately.





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## What if?

**I think there is an issue with a process that could adversely affect quality or safety but if I say anything, we will be delayed further as the Company investigates. What should I do?**

You should report the matter immediately and seek guidance from your manager.

---

## Learn more

» [Group Quality Policy](#)

## Who to contact



[quality@renishaw.com](mailto:quality@renishaw.com)



## Conflicts of interest

A conflict of interest can occur whenever you have a competing interest or activity that may interfere with your ability to make an objective decision on behalf of Renishaw. Each of us is expected to use good judgement and avoid situations that can lead to the appearance of a conflict. Even the perception of a conflict can undermine the trust others place in us and damage our reputation when making independent good ethical business decisions.

Conflicts of interest may be actual, potential, or even just a matter of perception. Since these situations are not always clear-cut, you need to disclose them to your manager so that they can be properly evaluated, monitored, and managed. Managing any conflicts of interests is our way of demonstrating we are responsible and transparent about how we do business.

### **Be alert to situations, including the following common examples of potential conflicts of interest:**

#### **Personal relationships**

It is possible that you may find yourself working with a relative or someone you have a close personal relationship with who works for a customer, business partner, competitor, or even at Renishaw. Since there are many scenarios that could create a potential conflict, you should disclose your situation to your manager to determine if any precautions need to be taken.

#### **Outside employment**

To ensure that there are no potential conflicts, you always need to disclose and discuss outside employment with your manager. Working for a competitor, business partner, or customer may raise conflicts. Any approved side or personal business should not compete with Renishaw.

#### **Personal financial interest**

A conflict can occur if you have a significant ownership, or other financial interest, in a competitor, business partner, or customer. Make sure you know what's permitted by our policies and seek help with any questions.

#### **Civic activities**

Unless Company management specifically asks you to do so, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, business partners, or customers, especially if your current job gives you the ability to influence our relationship with them.

---

## Do the right thing

- » Avoid conflict of interest situations whenever possible.
- » Always make business decisions in the best interest of Renishaw.
- » Think ahead and proactively address situations that may put your interests, or those of a family member, in potential conflict with Renishaw.
- » Discuss with your manager full details of any situation that could be perceived as a potential conflict of interest.

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## Learn more

- » [Group Conflict of Interest Policy](#)

### Who to contact



Your manager, or  
[HR@renishaw.com](mailto:HR@renishaw.com) or [legal@renishaw.com](mailto:legal@renishaw.com)

 Speak Up



## Gifts and hospitality

A modest gift may be a thoughtful “thank you”, or a meal may offer an opportunity to discuss business. If not handled carefully, however, the exchange of gifts and entertainment could potentially be improper or create a conflict of interest. This is especially true if an offer is extended frequently, or if the value is large enough that it could be offered in an attempt to influence a business decision. All gifts and hospitality, given or received, must be reasonable and proportionate.

Only offer and accept gifts and hospitality that comply with our policies. Please see the Gifts and Hospitality section in the Group Anti-Bribery and Corruption Policy for further information on when you are required to report anything given or received in the Gifts and Hospitality Register.

**Remember:** We do not accept or provide gifts or entertainment to anyone if the intention is to influence a decision improperly, even if it complies with our policies.

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### Do the right thing

- » Never give or accept cash or cash equivalents.
- » If required, accurately record what has been given or received in the Gifts and Hospitality Register.
- » Only provide and accept gifts and entertainment that are reasonable and proportionate to business relationships.
- » Never offer gifts to – or accept them from – a business partner with whom you are involved in contract negotiations.
- » Make sure that anything given or received complies with the Company policies of both the giver and the recipient.
- » Do not request or solicit personal gifts, favours, entertainment, or services.
- » Raise a concern whenever you suspect that a colleague or business partner may be attempting to influence a decision of a customer or government official, or you suspect any third party may be attempting to influence you.



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## Watch out for

- » Situations that could compromise you or our Company and bring your or our reputation into disrepute (for example, taking customers to adult entertainment venues or casinos).

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## What if?

**When travelling, I received a gift from a business partner that I believe was excessive and above the threshold defined in the Group policy. What should I do?**

You need to complete the Gifts and Hospitality Register as soon as possible, to seek approval. If approval is not given, we may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.

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## Learn more

- » [Gifts and Hospitality Register](#)
- » [Group Anti-Bribery and Corruption Policy](#)

## Who to contact



Your local legal team or [legal@renishaw.com](mailto:legal@renishaw.com)

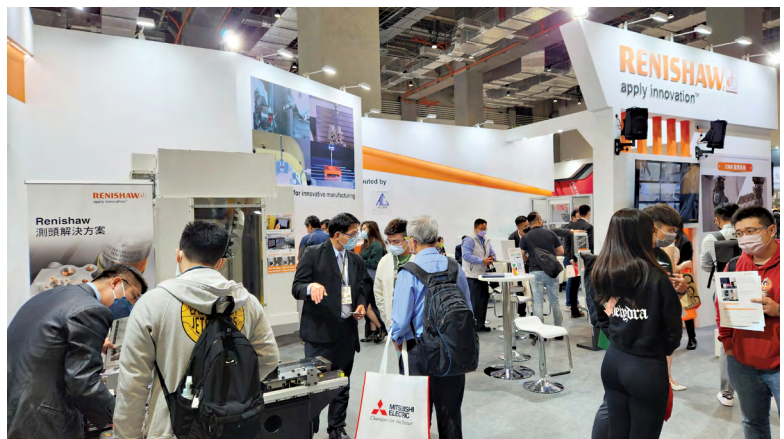


# Our industry

## Global trade

Renishaw has global operations that support a worldwide customer base. To maintain and grow our global standing, we must comply with all applicable laws that govern the import and export of our goods, software, services and technology (collectively 'products'). Failure to comply with applicable laws, could have serious consequences for you and long-lasting effects on Renishaw's business.

If you are involved in import and export activities (including sales), you are responsible for performing due diligence and checking for 'red flags' to ensure Renishaw complies with all applicable trade compliance requirements.



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## Do the right thing

- » Ensure that any information provided for customs purposes (such as product descriptions, weights, values, commodity codes and country of origin) is accurate.
- » Obtain all necessary import/export authorisations applicable to import and export of products.
- » Perform due diligence to ensure Renishaw does not do business with persons or entities that are:
  - › restricted parties as identified in applicable sanctions lists.
  - › engaged in prohibited activities such as the development of weapons of mass destruction.
  - › in a restricted destination according to Renishaw's Group Sanctions and Restricted Destinations Policy.
  - › intended to unlawfully divert products to a restricted destination or restricted party, or for prohibited activities.
- » Record complete and accurate information regarding every import and export.

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## Watch out for

- » Any red flags that may indicate that there is a risk with the transaction or further due diligence will be required.
- » Dangerous goods which may need extra care during transport, as detailed in the accompanying product safety sheet.

---

## What if?

### **I have received a purchase order from an agent located in a 'low risk' country that refuses to provide information about the intended end user or end use of Renishaw product?**

This would be considered a red flag, and you should not proceed with accepting an order unless you have resolved all red flags associated with the intended transaction.

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## Learn more

A range of policies relating to Sanctions, Dangerous Goods, Export (Red Flags) and Trade Control can be found [here](#).

### **Who to contact**



Your local team or [trade.compliance@renishaw.com](mailto:trade.compliance@renishaw.com)

## Anti-bribery and corruption

All forms of bribery and other corrupt practices are unacceptable, regardless of local customs. Renishaw is committed to complying with all applicable anti-bribery and corruption laws.

We have a zero-tolerance approach to bribes and fraudulent behaviour. This applies equally to any person or firm who represents our Company or with whom we do business.

It is especially important that we exercise due diligence and monitor third parties acting on our behalf. We screen business partners who work on our behalf, particularly when dealing in countries with high corruption rates, and in any situations where 'red flags' would indicate further screening is needed before retaining the business partner. Our business partners must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

### Key definitions

- » **Bribery** means offering, promising, giving or accepting any financial, or other, advantage, to induce the recipient (or any other person) to act improperly in the performance of their functions, to reward them for acting improperly, or otherwise to cause to the recipient to act improperly through accepting the advantage.
- » **Corruption** is the abuse of entrusted power or position for private gain.
- » **Facilitation payments** made with the purpose of expediting or facilitating the performance by a public official of routine bureaucratic transactions. Be extra careful, as these payments can be dressed up as administration fees, commission payments or local taxes.
- » **Government officials** is a very broad term and can include university staff, civil servants (for example, in defence departments) and individuals working for public bodies that provide research funding.



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## Do the right thing

- » Understand that Renishaw's zero-tolerance approach to bribery and corruption applies to your role at Renishaw.
- » Never give anything of value inconsistent with local laws and regulations to any government official or other third party. If you are not sure of the local laws, the safest course of action is to not give anything of value.
- » Always complete the Gifts and Hospitality Register when required.

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## Watch out for

- » Any potential violations of the Group Anti-Bribery and Corruption Policy by colleagues or business partners.
- » Agents, distributors or resellers who do not wish to have all terms of their engagement with Renishaw clearly documented in writing.

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## What if?

**I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay this agent goes towards making payments or bribes to government officials. What should I do?**

Report this immediately to the Group General Counsel or via the Speak Up portal. If there is bribery and we fail to act, both you and our Company could be liable. While investigating these kinds of matters can be culturally difficult in some countries, any third party doing business with us should understand the necessity of these measures. It is important and appropriate to remind all third parties with whom we do business of this policy.

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## Learn more

- » [Gifts and Hospitality Register](#)
- » [Group Anti-Bribery and Corruption Policy](#)

### Who to contact



Your local legal team or [legal@renishaw.com](mailto:legal@renishaw.com)

## Share dealing

During the course of business, you may become aware of confidential information about Renishaw or other publicly traded companies that is not available to the public. Trading securities (for example, shares) while aware of such information, or disclosing it to others who then trade ('tipping'), is illegal.

We as a company respect insider dealing laws and you should not misuse, or place yourself under suspicion of misusing, information about Renishaw or any other company which is not public. Generally speaking, you can deal in Renishaw shares at any time – but restrictions apply to certain employees (please see the 'Learn more' section below).

### Inside information

Inside information is significant and precise information about a company or its securities which is not publicly available. This is likely to affect the price of such securities, and an investor would likely consider this information when deciding whether to buy or sell the securities.

Some examples of inside information about a company are:

- » a proposed acquisition or sale of a business.
- » a significant expansion or cutback of operations.
- » a significant product development or important information about a product.
- » significant and non-public changes in revenue expectations.



---

## Do the right thing

- » Do not buy or sell securities of any company when you have inside information. Do not encourage anyone else to do so.
- » Protect inside information and other confidential information from the public including information in electronic form and in paper copy.
- » Familiarise yourself with the Group Share Dealing Policy, particularly if you have been informed that you are subject to extra rules; for example, if you have been informed that any of the restrictions set out in the Group Share Dealing Policy apply to you.

---

## Watch out for

- » Sharing significant and sensitive information with friends or family that is not publicly available about Renishaw, or companies that we do business with or have confidential information about. Even casual conversations or sharing information (unless it is essential for your work) by accident could be viewed as illegal tipping of inside information, even if you don't benefit from their dealing.

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## Learn more

- » [Group Share Dealing Policy](#)

### Who to contact



[companysecretary@renishaw.com](mailto:companysecretary@renishaw.com)

## Cooperation with investigations and audits

From time to time, employees may be asked to participate in internal and external investigations and audits that are conducted by our Company. All employees are expected to fully cooperate with all such requests and ensure that any information you provide is true, accurate, and complete.

You may also receive inquiries or requests from government officials. If you learn of a potential government investigation or inquiry, immediately notify your manager and consider if any local teams need to be made aware before taking or promising any action.

If you are directed by our Company to respond to a government official's request, extend the same level of cooperation and again, ensure that the information you provide is true, accurate, and complete.



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## Watch out for

- » Falsified information. Never destroy, alter, or conceal any document in anticipation of, or in response to, a request for these documents.
- » Unlawful influence. Never provide or attempt to influence others to provide incomplete, false, or misleading statements to a Company or government investigator.

## Who to contact



Your manager, or [legal@renishaw.com](mailto:legal@renishaw.com)



Speak Up





## Competition and antitrust

We believe in healthy and fair competition. Renishaw does not condone or engage in any activity that may prevent, restrict or distort competition. We will never seek to limit competition or try to gain competitive advantages through unethical or illegal business practices.

Competition laws are complex and require case by case assessment, such as consideration of relevant market share and relative market position and the relationship between parties. Renishaw uses external specialist competition and antitrust counsel to support its compliance requirements and provide specialist advice when needed in this area.

**The following activities are examples of red flags, which must be avoided, and, if detected, immediately reported to the Group Legal:**

- » **Collusion or ‘cartels’** – when competitors secretly communicate, share or exchange commercially sensitive information and agree how they will compete.
- » **Bid-rigging** – when competitors or service providers manipulate bidding so that fair competition is limited or not possible.
- » **Dictating or restricting** a distributor or reseller’s ability to determine its own sale prices.
- » **‘Abusing’** a dominant market position.



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## Do the right thing

- » Do not enter into any anti-competitive agreements or discuss market share, including setting prices or dividing up customers, suppliers, or market sectors with a competitor.
- » If you consider another party is acting in a way that is contrary to competition or antitrust laws, leave the meeting immediately and ensure your objection and absence is formally acknowledged and inform your usual contact in Group Legal as soon as possible.
- » Do not discuss current or prospective tenders or contracts with competitors (including how much Renishaw has, or intends to, bid).

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## Watch out for

- » Take care when appointing a distributor that you comply with local competition laws, including checking any territorial restrictions.
- » Take care to not share competitively sensitive information with a competitor at trade shows, trade association meetings or general informal settings.
- » Be careful when accepting or seeking information from third parties. Sources of information should be trusted and not protected by confidentiality or other obligations.
- » Using job interviews as a way of collecting confidential information about competitors or others.
- » Non-compete clauses and exclusive licences of IP which may need assessment from Group Legal.

---

## Learn more

- » [Group Competition Law Policy](#)

### Who to contact



Your local legal team, or [legal@renishaw.com](mailto:legal@renishaw.com)



Speak Up



## Anti-money laundering

We are committed to conducting business in a way that prevents money laundering and complying with all anti-money laundering, financial crimes, and anti-terrorism laws wherever we operate.

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of moving funds made from illegal activities through a legal business to make them appear legitimate. Involvement in such activities undermines our integrity, damages our reputation, and can expose our Company and the individuals involved to severe sanctions. This includes both the process of overt money laundering and the failure of otherwise legitimate business to identify and report suspicions of money laundering.

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### Do the right thing

- » Report any suspicious financial transactions and activities to your local finance team.
- » To avoid 'tipping off', do not share with any other persons that a suspicion has been formed, or that a suspicious activity report has been lodged.

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### Watch out for

- » Attempts to pay in cash or in a different currency than shown on the invoice.
- » Requests to deliver to a country that differs from where payment originated.
- » Concerns about the legitimacy of a customer's, or beneficial owner's, reputation or source of wealth.
- » Avoidance of recordkeeping requirements.
- » Unverifiable requests to return payments to a different account from the account used to make a payment.
- » Payments made by someone who is not a party to the transaction.
- » Unusual changes to a customer's normal pattern of transactions or behaviour.

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### Learn more

- » [Group Anti-Money Laundering Policy](#)

#### Who to contact



[antimoneylaundering@renishaw.com](mailto:antimoneylaundering@renishaw.com)



Speak Up

## Anti-facilitation of tax evasion

We are committed to conducting business in an honest and ethical manner. We take a zero-tolerance approach to tax evasion and the facilitation of tax evasion. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems to counter tax evasion facilitation.

We take our legal responsibilities very seriously. We will uphold all laws relevant to countering tax evasion in all the jurisdictions in which we operate, including the Criminal Finances Act 2017.

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### Do the right thing

- » Do not turn a blind eye or ignore anything that you suspect might be tax evasion or facilitation of tax evasion.
- » Do keep complete and accurate records.
- » Do complete all tax declarations and documentation accurately and in line with local legal requirements.
- » Do watch out for diversion of funds which could potentially have a tax evasion motive.

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### Watch out for

- » Requests to change descriptions on documents that could misrepresent the nature of goods or services supplied.
- » Any request by an individual to be paid on a consultancy basis where local rules would require deduction of income tax at source, or a request by a supplier to be paid gross of tax where the payment should be subject to tax withholding.
- » Any request by a third party for payments to be made to a country different from where the third party resides or conducts business.
- » Any request by a third party to whom we have provided services to address their invoice to a different entity, where we did not provide services to that entity directly.

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### Learn more

- » [Group Anti-Facilitation of Tax Evasion Policy](#)

#### Who to contact



[anti-taxevasion@renishaw.com](mailto:anti-taxevasion@renishaw.com)

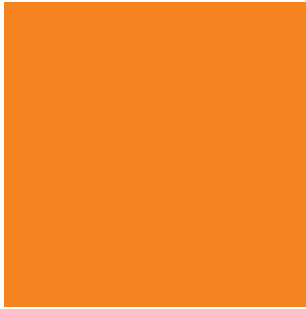


Speak Up

# Our community

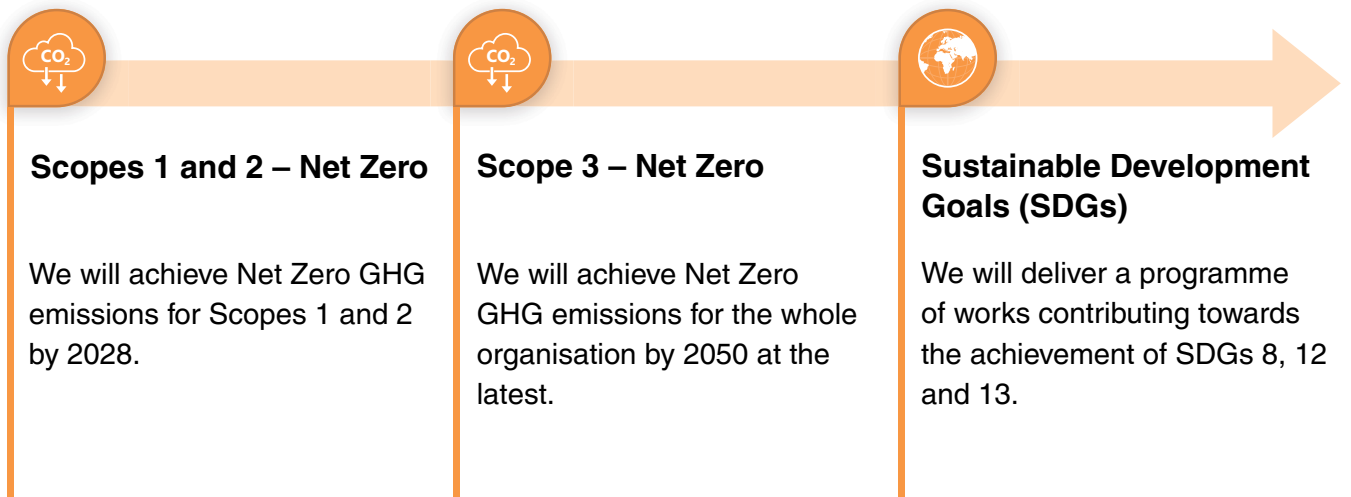
## Sustainability

We recognise our environmental and societal responsibilities and are committed to eradicating human rights abuses and practice that is not inclusive in our supply chains and minimising the impacts we have on the environment. We have committed to support the UN Sustainable Development Goals and have identified 8, 12 and 13 as those most material to our business. We have committed to achieve Net Zero GHG (greenhouse gas) emissions by 2050 at the latest with the Science Based Targets initiative (SBTi).



## Sustainability targets

**RENISHAW**   
apply innovation™



## Human rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery, human trafficking, child labour and any other human rights abuses. We do this through a risk-based assessment of our supply chain. Each of us can help support efforts to eliminate abuses such as child labour, slavery, human trafficking, and forced labour.

### Do the right thing

- » Report any suspicion or evidence of human rights abuses in our operations, or in the operations of our suppliers, to the local purchasing manager and Sustainability Team.
- » Respect for human dignity begins with our daily interactions with one another, our business partners, and our customers. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

#### Conflict minerals

Revenue from conflict minerals has been linked to funding for groups engaged in extreme violence and human rights atrocities. We work closely with suppliers of raw materials, parts, and components and communicate our expectation that suppliers and vendors will comply with all applicable laws, including laws aimed at providing conflict-free minerals.

### What if?

**When I was visiting a supplier, I noticed employees working there who seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps?**

You did the right thing; firstly to be on the lookout for human rights abuses and secondly to raise the issue with our supplier. The next step is to report the incident to the Sustainability Team. We are committed to protecting human rights and to the elimination of human rights abuses including child labour.


### Learn more

- » [Group Conflict Minerals Policy](#)
- » [Group Modern Slavery Statement](#)
- » [Corporate Responsibility-Sustainability](#)
- » [Group Modern Slavery and Human Trafficking Policy](#)

#### Who to contact



[sustainability@renishaw.com](mailto:sustainability@renishaw.com)

 Speak Up

## Responsible supply chain

Renishaw engages with approved supply partners who are committed to conduct business in line with our core values, and to meet our business needs and technical requirements.

Do your part to hold our business partners to our high standards and ensure they operate in an environmentally and socially responsible way, in compliance with the law, and in a way that's consistent with our Code, our policies, and our values.

## Charitable activities

Being a responsible corporate citizen is an integral part of Renishaw's culture. We believe in making a positive difference to people's lives and engaging responsibly in charitable activities to make a positive impact in the communities where we live and work. As a Company, we contribute funds, time and talent to support Company-wide programmes and local causes. We encourage you to participate in the many initiatives we support.

Renishaw also encourages you to make a difference on a personal level, supporting charitable and civic causes that are important to you. Be sure your activities are lawful and that you're participating in your own time and at your own expense. Never pressure your colleagues to participate and unless you receive approval in advance, please do not use Renishaw funds, assets or the Renishaw name to further your personal volunteer activities.





## Environmental stewardship

We recognise the impacts our business activities have on the environment and are committed to minimising damage to the planet and the local settings within which we operate.

We are committed to ensuring we as a business do our part to create a low carbon future. This means as employees we need to look at ways we can lower our material consumption, decrease waste, travel and energy use and increase recycling.

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### Do the right thing

- » Protect the environment. Read and understand all the information provided by our Company that is relevant to your job and operate in full compliance with environmental laws, regulations and company policies.
- » Fully cooperate with environmental training, and with our Company's periodic compliance reviews of our products and operations.
- » Stop work and report any situation that you believe could result in an unsafe working condition or damage to the environment.
- » Provide complete and accurate information in response to environmental laws, regulations, and permits.
- » Be proactive and look for ways that we can minimise waste, energy, and use of natural resources.

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### Learn more

- » [Group Environmental Data Policy](#)
- » [Group Management of Waste Policy](#)

### Who to contact



[sustainability@renishaw.com](mailto:sustainability@renishaw.com)



Speak Up



**Notes**

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Doing business  
**responsibly** 