

MM-EYE LTD – CODE OF ETHICS

1. PURPOSE AND SCOPE

It is the policy of **MM-Eye Ltd** to provide a Code of Ethics and Business Conduct which serves as a guide to proper business conduct for all employees, directors, contractors and consultants. We expect the highest standards of ethics, integrity and professionalism in all business activities.

2. BUILD TRUST AND CREDIBILITY

The success of our business depends on the trust and confidence we earn from employees, customers, suppliers and partners. We gain credibility by honouring commitments, acting honestly and conducting business with integrity.

When considering any action, employees should ask:

- Will this build trust and credibility for MM-Eye Ltd?
- Is this action lawful, ethical and consistent with our values?
- Can I stand by this decision publicly?

3. RESPECT FOR THE INDIVIDUAL

MM-Eye Ltd is committed to providing a working environment where everyone is treated with dignity and respect.

MM-Eye Ltd is an equal opportunities employer and will not tolerate discrimination, bullying, harassment or victimisation of any kind.

Any employee who believes they have experienced or witnessed inappropriate behaviour should report it **via the Whistleblowing or Grievance Procedure**.

4. OPEN AND HONEST COMMUNICATION

Employees are encouraged to raise concerns in good faith without fear of retaliation. The Board of Directors is responsible for ensuring a supportive environment where ethical concerns can be raised openly.

MM-Eye Ltd will investigate all reported concerns promptly and fairly. Retaliation against anyone who raises a concern in good faith will not be tolerated.

5. LEADERSHIP AND RESPONSIBILITY (TONE AT THE TOP)

The Board of Directors has overall responsibility for promoting ethical behaviour and ensuring compliance with this Code. Ethical conduct must be demonstrated through actions, not just words.

6. COMPLIANCE WITH LAWS AND REGULATIONS

MM-Eye Ltd is committed to complying with all applicable UK laws and regulations, including but not limited to:

- Companies Act 2006
- UK Bribery Act 2010
- UK GDPR and Data Protection Act 2018
- Employment and Health & Safety legislation

Employees must seek guidance if unsure whether an action complies with the law or company policy.

7. ANTI-BRIBERY AND CORRUPTION [NEW SECTION]

MM-Eye Ltd has zero tolerance for bribery or corruption. Employees must not offer, give, solicit or accept bribes or improper inducements of any kind, whether directly or indirectly.

8. FAIR COMPETITION

We compete fairly and ethically. We do not engage in price-fixing, bid-rigging, market sharing or improper coordination with competitors.

9. CONFLICTS OF INTEREST

Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of MM-Eye Ltd.

Potential conflicts must be declared to a director **in writing** before engaging in the activity.

10. CONFIDENTIALITY AND DATA PROTECTION [UPDATED – MERGED & MODERNISED]

Employees must protect confidential and proprietary information, including personal data relating to employees, customers and suppliers.

All personal data must be handled in accordance with the UK GDPR and MM-Eye Ltd's Data Protection Policy.

11. ACCURATE RECORDS AND FINANCIAL INTEGRITY

All company records must be accurate, complete and maintained in accordance with legal and accounting requirements.

Employees must not interfere with audits or misrepresent financial information.

12. ETHICAL MARKETING

MM-Eye Ltd is committed to honest, transparent and responsible marketing. We do not make misleading claims or conceal material information.

13. USE OF COMPANY RESOURCES

Company resources are provided primarily for business use. Limited personal use is permitted provided it does not interfere with work or breach company policies.

MM-Eye Ltd reserves the right to monitor company systems in line with applicable law.

14. WHISTLEBLOWING

Employees may report concerns confidentially and, where appropriate, anonymously. Reports will be handled in line with the Whistleblowing Policy and the Public Interest Disclosure Act 1998.

15. ACCOUNTABILITY AND BREACHES

Violations of this Code may result in disciplinary action up to and including dismissal. Serious breaches may be reported to external authorities where required by law