



James Walker Group

Ethics Statement

4 February 2026

James Walker Group Limited and its subsidiaries (the 'Group') is committed to the highest standards of ethical conduct and integrity in its business activities globally and to compliance with all local and international law. The Group believes that such an approach is essential to the long-term wellbeing of the Group itself, its shareholders, employees, customers, suppliers and the communities in which it operates.

Ethical issues and the Group's performance in these matters are of key interest to its shareholders. The Group communicates openly about these matters where this does not infringe upon commercial interests.

This statement is supported by our detailed group policies and procedures, including our Global Anti-Corruption Policy and Procedures, Whistleblowing Policy, Anti-Slavery and Human Trafficking policy, Occupational Health, Safety & Environmental policy, Data Protection policy, Fraud Risk Management Policy and CSR & Sustainability policy. Responsibility for oversight rests with the Board of Directors, whilst day-to-day implementation is led by management, with regular training and guidance provided.

Employees

Our employee policies are created and maintained locally within each business unit to ensure that we operate with due regard to cultural diversity and fairness. Our Values and Behaviours are promoted group-wide and Ethos, Values and Behaviours e-learning has been rolled out across all businesses and is mandated to managers and new starters.

We treat employees with dignity and respect and ensure equal opportunity to all employees. Local employment policies address working conditions, recruitment, development and training, reward, health, safety and security, equal opportunities, retirement, redundancy, discrimination and harassment and sit alongside the Group policies listed above.

Integrity is an essential part of our working environment and it stimulates fairness, mutual trust and consideration.

The Group has zero-tolerance to modern slavery, bribery and fraud and is committed to acting ethically and with integrity in all business dealings and relationships.

Customers & Suppliers

When employees are conducting business on behalf of any of the Group companies, they must ensure that they uphold the Group's reputation for observing the highest ethical standards.

Employees must avoid entering into any situation where their personal or financial interests may conflict with those of the Group.

If an employee finds themselves in a situation where a conflict of interest may arise, they should disclose that interest to their line manager to make the final decision.

Conflicts may arise because of family interests, knowledge of friends or financial investment. In all cases, employees must act in the Group's interest and disregard their personal preferences.

Please refer to our Global Anti-Corruption Policy and Procedures for guidance in relation to corporate gifts or entertainment.

When dealing with suppliers we must take reasonable steps to ensure that they also behave with the ethical standards we expect of ourselves.

Markets

We supply products that are used in a diverse range of machinery and equipment. We must ensure that:

- we do not provide products that are used in the violation of human rights or the arms trade where this equipment may be transferred to oppressive regimes.
- we do not support governments or businesses that fail to uphold basic human rights.

Products

We aim to limit the environmental impact during the manufacture and distribution of our products and we are committed to supporting our customers in achieving improved environmental performance, including their net zero journeys, through the development of our products and services (for example providing PFAS surfactant-free alternatives in our product range).

Seven of the 17 UN Sustainable Development Goals have been embedded into our strategic plan. Of these seven, four directly relate to addressing our environmental impact.

Our products must be deemed safe for the application they are supplied for.

Our products are designed not to damage the environment whilst in effective operation.

We will not be involved in testing products on animals.

Whistleblowing

We encourage anyone who becomes aware of suspected misconduct or unethical behaviour to speak up promptly through established channels. Employees should refer to our Whistleblowing Policy for guidance in this area.

Shareholders

We aim to protect our shareholders' investment, provide a sustainable return on their investment and provide accurate and timely communications.

Other Stakeholders and Wider Community

The Board places continued and serious emphasis upon its duties towards the full range of stakeholders in James Walker Group Limited and its subsidiaries and seeks to conduct its business to best serve its customers, staff, shareholders and business partners. This includes consideration of a wide range of other related interests such as environmental, societal and other sustainability obligations.

We will comply with the spirit as well as the letter of the law.

Ethics Statement Review Procedure

The Board of James Walker Group Limited will review this statement every two years.

This Ethics Statement was last reviewed and updated on 4th February 2026.

Diederik Neeb
Chairman & Chief Executive Officer
4 February 2026