

RENISHAW GROUP BUSINESS CODE

INTRODUCTION

Renishaw plc and its subsidiaries (the “Group”) are committed to conducting its business in a socially responsible manner with respect for the environment, its employees and all who deal with Renishaw.

The Renishaw plc board of directors has allocated responsibility to the Group Finance Director for recommending corporate social responsibility policies and processes for approval by the board and to monitor the activities of the Renishaw Group for compliance with such policies and processes.

This Code sets out principles of business conduct and standards which all companies in the Renishaw Group are expected to follow.

Renishaw will also seek to do business with partners whose business practices are consistent with the spirit of this Code, and will in turn encourage their supply chains to abide by the same spirit.

Sections A, B, C and D set out standards relating to business ethics, employee treatment, health and safety and environmental responsibility. Section E sets out the elements of the management systems that will help to ensure compliance and to this Code.

Employees will be supported in the understanding and adherence to this Code with explanatory materials and training where appropriate.

SECTION A

BUSINESS ETHICS

Renishaw will endeavour to behave with honesty and integrity in its business dealings, including the following:

A1. Legal compliance

Renishaw will comply with all applicable laws and regulations in the territories and business areas in which it operates.

A2. Fair dealing

No bribes or other means of obtaining an undue or improper advantage shall be offered, paid or accepted.

Fees or commissions for services rendered by third parties must be for legitimate business purposes and not an improper incentive for a business transaction.

A3. Fair competition

Renishaw shall comply with the competition laws in the territories in which it does business.

A4. Protection of intellectual property

Renishaw respects third party intellectual property and confidential information and will not take advantage of such third party assets which are protected by law, registration or contractual agreement.

A5. Trade controls

Renishaw will comply with applicable import and export laws and regulations and obtain authorisations for the import and export of goods, technology and information.

A6. Whistleblowing

Renishaw will ensure that any employee who has a concern that a member of the Renishaw Group or another employee is behaving illegally or in breach of this Code can raise such concerns openly and confidentially without fear of reprisal.

SECTION B
EMPLOYMENT

B1. Policy

Renishaw will abide by all employment laws and regulations of the countries in which it operates, and is committed to uphold the human rights of its employees on the basis of dignity and mutual self-respect.

B2. Freedom of association

B2.1 Renishaw will maintain open and direct engagement and involvement with all employees to ensure best working practice. All employees will be allowed to associate freely and join or not any legally authorised labour unions and associations and where relevant, seek representation, join workers councils and forums as provided for, and in accordance with local laws.

B2.1 All Employees are free to openly communicate with management regarding themselves, working conditions and such matters without fear of reprisal, intimidation or harassment.

B3. Child labour

B3.1 Renishaw will not engage for work, either directly or indirectly, any person who is defined as "a child". The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits) or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

B3.2 Renishaw may use legitimate and supervised workplace apprenticeship programmes which comply with all local laws and regulations.

B4 Freedom of Employment

B4.1 All work undertaken by employees will be provided on a voluntary consent basis and all workers will be free to leave employment upon reasonable notice. Renishaw will not employ or engage with any forced, bonded, involuntary or indentured labour.

B4.2 No employees will be required to permanently release to Renishaw, or any non-government labour agency, for the duration of their employment, their original government identification papers, such as passports or work permits.

B5 Slavery and human trafficking

B5.1 Renishaw has a zero-tolerance approach to modern slavery and is committed to ensuring modern slavery is not taking place anywhere in Renishaw's business or in any of its supply chains (see the Renishaw Group Modern Slavery and Human Trafficking Policy).

B5.2 Renishaw is also committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015.

B53 Renishaw expects the same high standards from all of its contractors, suppliers and other business partners and that its suppliers will hold their own suppliers to the same high standards.

B6. Pay and benefits

B6.1 Remuneration paid to all employees, whether employed directly or indirectly shall comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws and the contractual terms entered into by the relevant employees, all such personnel shall be compensated for approved overtime.

B6.2 Renishaw shall only make such deductions from wages as are allowed by law or by its contract with the relevant member of employees.

B6.3 Renishaw shall, in accordance with local laws and regulations, maintain proper records of how both remuneration and agreed contractual benefits are calculated and paid.

B7. Working time

B7.1 Normal working time will accord with all local laws and regulations and not exceed the maximum set by whatever method of calculation established by local law.

B7.2 All employees shall be allowed their agreed contractual vacation which must be in accordance with local laws and regulations.

B7.3 Working time for all employees must be set and supervised in such a way to avoid unnecessary strain or hardship which could give cause to loss of productivity and/or an increased likelihood of injury or physical or mental illness.

B8. Non-discrimination

B8.1 Renishaw will ensure employees will be free from any form of harassment and unlawful discrimination within the workplace.

B8.2 Renishaw will comply with all employment age legislation.

B8.3 Renishaw will provide reasonable opportunities for people with disabilities, as a minimum, always complying with local laws and regulations.

B8.4 Renishaw will comply with all applicable local laws, regulations and legislation regarding maternity and paternity, including leave and alternative employment opportunities.

B8.5 Renishaw will ensure that no employees are discriminated against on the basis of race, colour, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status.

B8.6 Renishaw will select individuals for employment and promotion based on merit and ability.

Renishaw will ensure that it has adequate safeguards and procedures to ensure that all personal data held by it is retained on a confidential basis and is only communicated to third parties when required by local laws and regulations or with the consent of the individual.

SECTION C

HEALTH and SAFETY

Renishaw recognises that ensuring that a healthy and safe working environment is fundamental to achieving its business objectives and to the quality of products and services that it provides to its customers. Renishaw will ensure the following practices are adhered to:

C1. Occupational safety and hygiene

Renishaw will adequately assess and control work place hazards and exposure to dangerous chemicals through organised monitoring of any health and safety concerns/incidents/exposure levels, risk assessments, preventative maintenance and process/workplace design and employee training. In addition, Renishaw will ensure that employees and third parties working at its premises are always equipped with the necessary Personal Protective Equipment (PPE).

C2. Emergency preparedness

Renishaw will put in place action plans that will protect employees and the business from emergency situations such as fire and flooding. Drills will be regularly carried out to ensure preparedness in the event of emergency situations.

C3. Occupational injury and illness

Systems and procedures will be put in place to manage and measure performance in terms of injury and illness.

C4. Physically demanding work

Renishaw will identify where employees are involved in repetitive or physically demanding work and ensure such practices are assessed and control measures are implemented to minimise impact upon employees.

C5. Machine safeguarding

Renishaw will assess all pieces of machinery for risk of injury/accident. Guarding, interlocks and appropriate safety measures will be provided to comply with local legislative requirements as a minimum.

SECTION D
ENVIRONMENTAL

Renishaw recognises that it must take responsibility for environmental impacts on the way in which it conducts its business. It seeks to minimise any adverse impact upon the environment, natural resources and the local community including the following standards of conduct:

D1. Environmental Permits & Reporting

All requirements for approvals, permits, monitoring will be obtained and maintained in compliance with local laws.

D2. Pollution Prevention and Resource Reduction

For both ethical and financial reasons Renishaw will seek to minimise or eliminate waste of all types and recycle materials as practical.

D3. Hazardous Substances

Chemicals and any other hazardous materials will be handled, stored, recycled and disposed within a systematic and controlled process.

D4. Waste Water & Solid Waste

Waste water and solid waste generated operations and sanitation will be monitored, controlled and treated as local legislation requires prior to discharge or disposal.

D5. Air Emissions

Air emissions of Volatile Organic Chemicals (VOCs). Ozone Depleting Chemicals (ODCs), aerosols and corrosive materials will be monitored, controlled and treated as required by local legislation prior to discharge.

D6. Product Content Restrictions

Renishaw will adhere to applicable legislation and regulations regarding the prohibition, restriction and disposal of specific substances as set out in applicable REACH, RoHS and WEEE directives. New products will be designed with RoHS compliance as an objective.

SECTION E
MANAGEMENT SYSTEMS

E1. Management systems

E1.1 Renishaw will establish and maintain a CSR management system designed to ensure compliance with applicable laws, regulations, and conformance with this Code by Renishaw employees and representatives who act on behalf of Renishaw.

E1.2 Renishaw will endeavour to understand and comply with customer requirements in relation to CSR.

E2. Management Accountability and Responsibility

E2.1 Renishaw will identify management representatives within Renishaw plc's divisional and subsidiary structure responsible for ensuring implementation of the Code.

E2.2 Written performance objectives, targets and implementation plans will be established to improve performance.

E3. Compliance

E3.1 Renishaw will plan, conduct and document periodic internal audits to ensure conformity to this Code.

E3.2 Where appropriate Renishaw's Corrective and Preventative Action process will be used to correct deficiencies.

E3.3 Renishaw will ensure there is a system to enable confidential feedback from employees to management to assist in compliance with this Code.

E4. Training

Programmes will be put in place to train employees on the interpretation and implementation of the Code. Training records will be maintained and audited on a periodic basis.

E5. Communication

E5.1 The existence of this Code will be communicated to employees and to representatives who act on behalf of Renishaw.

E5.2 Renishaw will communicate this Code to suppliers and seek compliance to the spirit of the Code.

E5.3 The Code will be made available on Renishaw's website for access by all stakeholders.