GROUP ETHICS & INTEGRITY POLICY

1   Purpose of the Policy:

It is the policy of The Welding Institute and all subsidiary companies whether active, inactive or dormant (Group) to ensure, as far as reasonably practicable, that all its business activities are carried out to the highest standards of ethical conduct. We believe that honesty and integrity engender trust, and we require all our people, consultants, agents and others engaged to work on behalf of the Group and any Group company to work in accordance with the laws and regulations of the countries in which it does business and according to appropriate ethical and legal frameworks, obligations and standards, so as to ensure the integrity and reliability of its activities.

This and related Policies create a culture of integrity based on good governance, best practice, and support for the development of our people. Its implementation will demonstrate to funding bodies, Members, our partners and the public that they can have confidence in all our activities.

2   Scope:

This policy applies to all Group directors and employees, whether permanent, fixed term, or temporary. It also applies to all students, consultants or sub-contractors, including any affiliates and third party organisations, working for or on behalf of the Group. The policy applies whether acting alone or alongside others.

Where activities are undertaken by a Group company in conjunction with one or more third parties, all members of the collaboration are to comply with the ethics and integrity requirements of both the Group and the collaborating partner's organisation. Should there be an absence of ethics and integrity requirements or a lower requirement in place at the third party, this Policy will prevail.

3   Policy:

The Group will

Culture
• Act with integrity at all times.
• Be transparent in all acts, operations and communications.
• Promote a trustworthy and honest atmosphere to reinforce the vision of ethical behaviours within the organisation(s).

Business Practices
• Comply with all applicable legal and regulatory requirements governing business relationships and international trade.
• Compete fairly and strongly in its market sector and not engage in, nor be party to, any agreements, business practices or conduct that, as a matter of law, are anti-competitive or may be construed as participation in trade or associated cartels, and avoid taking unfair advantage through manipulation, theft, concealment, abuse of confidential information, misrepresentation or other unfair practices.
• Provide customers with products and services which meet or exceed their requirements, respond quickly to changing customer demand and seek to continuously improve product and service quality, value and delivery times.
• Comply with all accepted environmental standards – meeting and seeking to exceed applicable regulatory and legal requirements.
• Provide services and products that meet or exceed all applicable laws, regulations,

standards and industry practices.
- Adhere to all relevant government guidelines designed to ensure that products and services are not incorporated into weapons or other equipment used for the purposes of terrorism, internal repression or the abuse of human rights.
- Safeguard its assets (and any assets in its care) from misuse or misappropriation.

Research Activities
- Put procedures in place to ensure that research is conducted in accordance with research integrity best practice and the latest external ethical, legal and professional requirements.
- Create a research environment that is underpinned by a culture of integrity and based on good governance, best practice, and support for the development of our people.
- Observe the highest standard in the conduct of research and do not undertake any acts of research misconduct. Research misconduct is characterised as behaviours or actions that fall short of the standards of ethics, research and scholarship required to ensure that the integrity of research is upheld. It can cause harm to people and the environment, wastes resources, undermine the research record and damage the credibility of research. It excludes genuine errors that are not due to negligence, differences in interpretation or judgement in evaluating research methods or results, or misconduct unrelated to research processes. It does not include research projects that are unsuccessful in achieving their objectives. Research misconduct can take many forms, including:
    - fabrication: making up results, other outputs (for example, artefacts) or aspects of research, including documentation and participant consent, and presenting and/or recording them as if they were real
    - falsification: inappropriately manipulating and/or selecting research processes, materials, equipment, data, imagery and/or consents
    - plagiarism: using other people's ideas, intellectual property or work (written or otherwise) without acknowledgement or permission
    - failure to meet: legal, ethical and professional obligations, for example:
        - not observing legal, ethical and other requirements for human research participants, animal subjects, or human organs or tissue used in research, or for the protection of the environment or breach of duty of care for humans involved in research whether deliberately, recklessly or by gross negligence, including failure to obtain appropriate informed consent
        - misuse of personal data, including inappropriate disclosures of the identity of research participants and other breaches of confidentiality
        - improper conduct in peer review of research proposals, results or manuscripts submitted for publication. This includes failure to disclose conflicts of interest; inadequate disclosure of clearly limited competence; misappropriation of the content of material; and breach of confidentiality or abuse of material provided in confidence for the purposes of peer review
    - misrepresentation of:
        - data, including suppression of relevant results/data or knowingly, recklessly or by gross negligence presenting a flawed interpretation of data
        - involvement, including inappropriate claims to authorship or attribution of work and denial of authorship/attribution to persons who have made an

appropriate contribution
  ▪ interests, including failure to declare competing interests of researchers or funders of a study

- Deal with any allegations of research misconduct using transparent, timely, robust and fair processes.
- Continuously strengthen research integrity processes, reviewing progress regularly and openly, keeping up to date with best practice, by engaging with other organisations. These include Members, funding bodies, peer reviewers, professional institutions, publishers and support bodies such as the UK Research Integrity Office in the UK.
- Defend our people when they live up to the policy expectations in difficult circumstances.

Stakeholders

- Create and maintain an environment in which all our people are treated with respect and differences are highly valued.
- Complying with all applicable anti-discrimination legislation and workplace regulations in the countries it operates in.
- Treat all its customers, employees, agents and others engaged to work on behalf of the company fairly and with respect and dignity.
- Work in partnership with suppliers and subcontractors to meet customer expectations and ensure quality, value and timeliness of delivery.
- Seek to uphold internationally recognized human rights wherever its operations are based.

Training

- Train and support our technologists, line managers and peer reviewers to develop ethics and integrity competence.

4   Ethics Committee

The Ethics Committee will be free from bias and undue influence from the department they operate in, the group entity in which they are located and colleagues who submit research proposals for the committee's consideration. Each participant must act independently and impartially in decision making and any conflict of interest should be declared.

The Ethics Committee will comprise an Executive Director and senior employees from across the business, as determined by its terms of reference, and has the following main responsibilities:

- Promoting ethical conduct within the business
- Overseeing, monitoring, coordinating and communicating guidance to the business on ethical matters
- Monitoring and supervising this Group Ethics and Integrity Policy implementation and execution
- Assisting in the consideration and resolution of ethical dilemmas
- Producing the annual research integrity statement for TWIL and any other applicable entities.
- Maintaining awareness of ethical guidance statements from similar organisations in the UK, Europe, and internationally.

Outputs of the Ethics Committee will be reported to the Executive Board on a six-monthly basis.

5   Incident Reporting

Any incidents which have led, or could have led to a breach of this Policy shall be communicated to the Chair of the Ethics Committee and notified to the Risk and Compliance Team. If such an incident relates to the Chair of the Ethics Committee, the incident may be raised to the following individuals subject to their being no conflict of interest (i) Vice Chair of the Ethics Committee, then (ii) Head, People and Culture and Head, Risk and Compliance.

Incident investigations will be undertaken in a robust and transparent manner using fair processes. Applicable third parties will be informed of incidents.

6   Compliance

The Risk and Compliance team or Quality team (as applicable) will perform periodic compliance assessment through various methods, including but not limited to, business tool reports, internal and external audits, and feedback.

For advice and support in relation to this Policy, contact the Director (Research), the Chair of the Ethics Committee or the Risk and Compliance team.

7   Linked policies and procedures:

The following are a list of key linked policies* and procedures* (this list is not exhaustive)

Code of Conduct

Conflict of Interest Policy

Corporate Social Responsibility Policy*

Counterfeit Parts Policy

Group Data Protection Policy*

Diversity and Inclusion Policy

Ethics Committee Terms of Reference*

Group Anti-Fraud, Bribery and Corruption Prevention Policy

TWI Health, Safety and Environmental Policy

Product (SCP, CRP, Collaborative) Procedures

Quality Policy

Whistleblowing Policy

* pending

8   Referencing

UKRIO - The concordat to support Research Integrity
In-house training (contact People and Culture)