

OUR PRINCIPLES, OUR PURPOSE.

CODE OF CONDUCT

A commitment to our global team, our values and integrity.

THOR expect extraordinary

COO Message

A message from Giuseppe De Lucia

Giuseppe De Lucia, Chief Operating Officer, EMEA, and Main Board Director
Being part of THOR means being part of something bigger than ourselves...

Across our global business, almost 2,000 people contribute their knowledge, experience, and commitment every day to help our customers succeed. We've been operating this way for over 65 years, and I am proud to be part of an organisation with such a strong heritage and an exciting future.

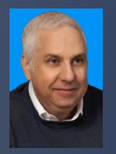
Our purpose is to create lasting solutions that enable the extraordinary. Whether we are developing new technologies, supporting customers, or working behind the scenes, each of us contributes to that goal. The impact of what we do can be seen in everyday products and industries around the world.

None of this would be possible without trust. Trust takes years to build and can be lost in a moment. That is why acting responsibly, treating others with respect, and doing the right thing must remain at the heart of every decision we make. How we achieve our results is just as important as the results themselves.

Our Code of Conduct describes the standards that are expected of all of us. More than a set of rules, it reflects who we are as a business and the culture we want to maintain. It supports the values that guide our actions every day: Solve with ingenuity. Deliver with integrity.

I ask every one of you to take the time to read and understand the Code, and to use it whenever you are faced with a difficult decision. If something doesn't feel right, speak up! Raising concerns and asking questions is part of the responsibility that each of us has to protect THOR's reputation, support our colleagues, and uphold the high standards that our customers and communities expect from us.

Together, by living our values and holding ourselves accountable, we continue to create lasting solutions that enable the extraordinary.



Giuseppe De Lucia
Chief Operating Officer, EMEA

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COO Message

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CODE OF CONDUCT

An introduction to the principles, responsibilities and expectations that guide how we work at THOR, ensuring we act with integrity, make ethical decisions and uphold our shared values.

OUR PURPOSE

To create lasting solutions that enable the extraordinary.

OUR VALUES

Solve with ingenuity. Deliver with integrity.

This is the foundation for how we operate as a business, outlining the values, principles and standards that guide our decisions, behaviours and relationships. It provides everyone at THOR with the guidance needed to act responsibly, ethically and with integrity in everything we do.

What is the Code of Conduct?

The THOR Code of Conduct outlines our commitment to and gives guidance on how we do business regarding standards of integrity and ethics. It describes the basic rules of conduct that we are expected to follow. The Code also assists us in applying these rules and policies in practice by giving us guidance on actions and behaviours that match our company values.

Who has to follow the Code of Conduct?

The Code applies to everyone involved with THOR. This is wide ranging and includes all of THOR's Business Units, legal entities and branches. It also applies across all jurisdictions where the organisation operates. It applies to all employees (whether temporary, fixed-term, permanent, contracting, paid or unpaid) and all Officers, Board and/or Committee members at any level.

If the code says we, us, our, you or I; you should interpret this as meaning that it applies to everyone at THOR.

THOR has also made a commitment to do business only with others who share our values and undertake their business with the highest standards of integrity and ethics.

What are our obligations?

Integrity is a core part of THOR's values, and so operating with integrity and undertaking business ethically is an absolute requirement of working at THOR. We are all expected to read, understand, and follow the Code of Conduct. All existing employees are asked to sign-up to the Code, demonstrating that they understand it and will follow it; acting with integrity at all times. New employees will be asked to sign-up at the very start of their journey with THOR when accepting their contract of employment.

The Code acts as our guide for business conduct. It is written to give us guidance and support, and to assist us in making the correct decisions to act ethically and in compliance with the laws that affect us.

We are a global organisation and subject to many local laws and regulations and we face many situations in our daily business lives. This means the Code cannot cover everything - all of our employees are expected to act in accordance with the CoC or over and above it, where local legislation requires.

If you are in any doubt you should seek guidance from your local Human Resources Manager or the Group Compliance Team.

What happens if the Code of Conduct is breached?

Not following the Code can have serious consequences for us as individuals and for THOR as an organisation. Breaching the Code may result in disciplinary action, up to and including termination, in line with local guidelines and regulations. It may also cause reputational damage to THOR and could result in significant financial penalties or fines for the business.

SO, before you act, ask yourself:

- Does it feel right?
- Does it meet the requirements of the Code of Conduct?
- Is it legal?
- Is it fair to all
- Would I feel OK if someone else knew about it?

If you can't answer yes to all of these then you need to stop and think again. It's always okay to ask for guidance.



WHEN SHOULD I SPEAK UP?



When Should I Speak Up?

Speaking up helps protect THOR's values, our people and our business. Whether you need advice or have concerns about unethical or inappropriate behaviour, you should feel able to raise them safely and without fear of retaliation.

Asking for advice

You may face difficult situations in your work.

Our Code and your good judgement may be enough to guide you to take the correct action. However sometimes you may need help to make the correct decisions. You should speak in the first instance with your manager and if you need further help you can speak with your HR Team or with Group Compliance.

If you see something that you suspect is unethical, illegal, or contrary to our values and the Code, you should speak up.

It may seem like the easy option to look the other way, but "delivering with integrity" means always doing the right thing.

Not just when it's easy, but especially when things are difficult. Not living up to good business and personal practices affects all of us. Remember no concern is too minor to report.

How do I speak up?

If you feel you are in a position to challenge the behaviour you should do so appropriately.

If you feel you are not in a position to challenge the behaviour yourself, this is where you need to SpeakUp. Start with your manager, they will usually be the best person to listen to your concerns and take the necessary action. If you feel unable to speak with your manager you can SpeakUp to your HR Team or another member of senior management.

There may be times when you do not feel comfortable raising a concern to your local management, due to the severity of the issue or the people implicated. In these circumstances we should report concerns to SpeakUP, the ethics and compliance whistleblowing hotline. This is a service run by an independent third party, which is available 24/7 in all countries where we have operations.

SpeakUP allows anonymous reporting. We would ask though that you give your details if you feel you are able to allow us to complete a full investigation.

What happens when I make a report to the SpeakUP Hotline?

You may leave a phone or web report with your concern; both of these can be anonymous if you prefer. You will be given a case number for your concern and this is the reference number for you to check back on the status of your report. Once received, details of your report are passed to the Group Compliance department who will then ensure that the report is investigated in the most appropriate way.

All reports are taken very seriously and you can be assured that processes are in place to ensure they are handled correctly.

A summary of all cases is reviewed at the Group Ethics and Compliance Committee two times per year.

Anti-retaliation

It takes courage to raise your concern, but you should feel safe to do so.

Retaliation for asking questions, making a good faith report or participating in an investigation will not be tolerated regardless of whether the concern turns out to be justified or not.

What does good faith mean?

A good faith report is a concern that you genuinely believed to be correct. It does not matter if the report is subsequently found to be unfounded as long as all truthful information was given at the time to aid in the investigation.

Related Group Policies

- Whistleblowing Policy



OUR WORKPLACE

Health, Safety and the Environment

Everyone has a responsibility to help protect the health and safety of our people, visitors and communities, while reducing our impact on the environment.

By following policies and procedures, completing required training, using the correct protective equipment and acting when something does not look right, we help create a safe, responsible and sustainable workplace.

What do we mean?

Good management of our health, safety and environmental performance is integral to our success, it's how we operate each and every day.

What do we believe?

We believe in and are committed to looking after the health and safety of all employees, visitors and others who may be impacted by our operations. We are also committed to conducting our business in an environmentally responsible manner.

Our aim is to meet or exceed compliance with all health, safety and environmental laws and regulations.

Staying safe and a good environmental ambassador

We always follow our health, safety and environmental policies and procedures. We also ensure that operations are carried out in compliance with local health, safety and environmental laws and regulations.
We look out for our fellow workers and others who may be impacted by unsafe conditions or acts. We take care of the environment and make sure that our environmental impact is controlled.

What if I see something wrong?

If we see something that could put us, others or the environment at risk we don't walk past or ignore it - we take action. At all times, we take an active part keeping ourselves, others and the environment safe.

We all need to take an active part in managing the health, safety and environmental risks of the company.

We make sure:

- If PPE is required, we wear it and treat it as if it's our own.
- If a procedure needs to be followed to keep us safe, we follow it.
- If training is required, we complete it.
- If it doesn't look right, we take action or we report it.

Related Group Policies

- Group HSE Incident Reporting Policy
- Group Environmental Policy



Dignity and Respect

What do we believe?

We believe in an inclusive and diverse workplace where everyone connected with us is treated with dignity and respect.

Diversity and inclusion

We always treat everyone we connect with fairly regardless of their personal beliefs or differences. Everyone has the same merit-based opportunities within our business.

Harassment

We never bully or harass anyone, either physically or verbally. This means we will never violate an individual's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Respect and responsibility

In all communications whether face to face, virtual or written we will always be respectful. In line with our company values we will always be open and honest. We celebrate THOR as a place of diversity and inclusion and we don't discriminate or harass anyone based on their personal beliefs or difference.

This could include:

- Age.
- Disability.
- Gender reassignment and gender identity.
- National origin.
- Sex or sexual orientation.
- Marital or civil partnership status.
- Family, pregnancy, parental or carer status.
- Race including ethnic origin.
- Genetic information.
- Religious, political or other beliefs.
- Full-time or part-time employment status.

Related Group policies:

- THOR Anti-Discrimination and Anti-Harassment Policy
- Equal Opportunities Policy
- DEI Policy

Drugs and alcohol

What do we believe?

Alcohol and substance abuse limit our ability to do our jobs safely and efficiently which puts us all at risk.

We should report fit for duty at all times.

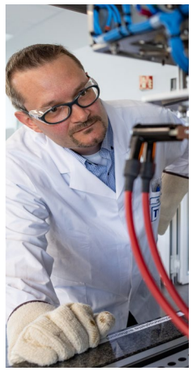
What are my responsibilities?

We must never be under the influence of alcohol, illegal drugs or a lawfully prescribed prescription drug which affects our performance or creates a risk to safety whilst at work or undertaking work for the company.

We must never undertake the unlawful use, purchase, sale, possession, distribution, transfer, or manufacture of alcohol (this includes legal manufacture except when associated with company business), illegal drugs or controlled substances, while on company property, while operating company machinery or vehicles, or while conducting company business.

Related Group policies:

- THOR Drug and Alcohol Policy



Quality

What do we believe?

We've built our reputation and our business on excellent customer service and providing quality products that meet or even exceed what our customers require.

We believe that everything we produce should be to the best possible quality and meet all the requirements of applicable laws and regulations.

Working to ensure that we produce quality products

We always comply with quality control standards, procedures and customer agreed specifications. In addition to making sure we ourselves produce quality products and services we make sure our suppliers and others who supply us products and services meet the same high standards.

We always report any non-conformance with quality standards to line management and ensure that correct action is taken.

Related Group policies:

- Group Quality Control Policy

Fraud Management

What do we believe?

We have a zero tolerance for fraud. THOR is committed to:

- Setting the right tone at the top through our Group & Executive Board
- Identifying and managing fraud risks
- Encouraging ethical conduct and whistleblowing through the Speak Up process
- Investigating all allegations thoroughly & addressing findings appropriately
- Providing training on effective fraud management

Related Group policies:

- Fraud Management Policy

HONESTY AND INTEGRITY

At THOR, we believe that honesty, integrity, and respect are fundamental to the way we operate and build trusted relationships. We are committed to conducting business responsibly, making ethical decisions, and ensuring our actions reflect our values.

From how we work with employees and business partners to how we compete and engage with our communities, we uphold the highest standards of conduct in everything we do.

Bribery and Corruption

What does it mean?

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of advantage so to induce or influence an action or decision.

What do we believe?

We believe that our business should be conducted at all times with the highest standards of integrity and honesty. We do not allow others who act for us to breach any of the requirements that we ourselves must comply with.

Bribery and corruption

We never engage in bribery or corruption in any form. We do not give, offer or receive anything that could be considered a bribe.

Facilitation and grease payments

We do not make facilitation or grease payments to grant an advantage or facilitate an action to which we are otherwise entitled.

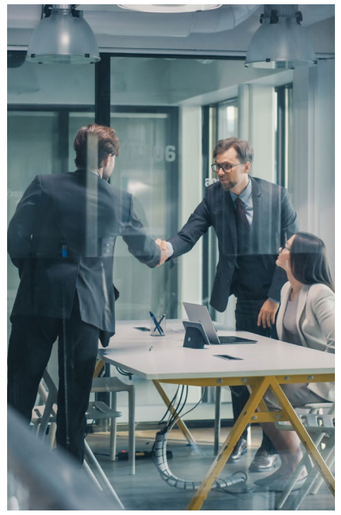
Political and charitable donations

We do not make donations in cash, kind or by any other means to support political parties or candidates. It is recognised this may be perceived as an attempt to gain improper business advantage. We only make charitable donations where certain the donation is fit and proper and cannot be viewed as influencing behaviour.
Group Compliance review and monitor charitable donations made to ensure these are appropriate.

Related Group policies:

- Anti-Bribery and Corruption Policy
- Group Charitable Donations policy

Gifts and Hospitality



What does it mean?

The exchange of legitimate gifts and hospitality that build goodwill in business relationships.

What do we believe?

We believe that gifts and hospitality providing they are not excessive and are appropriate to the circumstances can be an acceptable part of business relationships.

Gifts and Hospitality

We never give, offer or receive a gift or hospitality if the act of doing so may be seen to influence.

Gifts and hospitality can be an acceptable part of business. However, we know if giving or receiving we should ensure:

- It is not done with the intention of influencing the party to whom it is being given.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with international and local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent eg: a voucher or gift certificate.
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.

Related Group policies:

- Anti-Bribery and Corruption Policy



Conflicts of Interest

What does it mean?

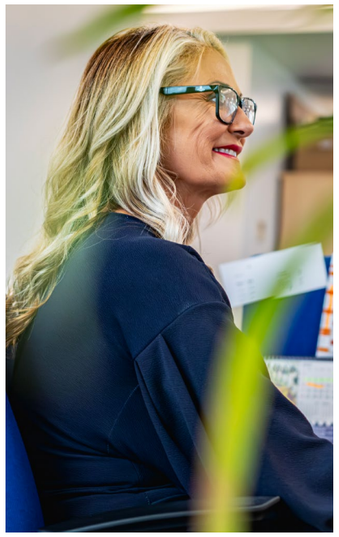
When employees' personal interests either influence, have the potential to influence, or are perceived to influence their decision making, a conflict of interest situation results.

What do we believe?

We always try to avoid conflicts of interest or any situation that may be perceived as a conflict of interest. Where we feel it cannot be avoided we report the situation promptly to our line manager and Group Compliance.

Working to avoid Conflicts of Interest

We discuss any potential conflicts of interest openly and honestly with our line manager. We agree and abide by a workable plan to manage the situation.



Being able to recognise a potential conflict can help you avoid one. A conflict of interest can occur in the following situations:

- Personal workplace relationships eg: hiring or supervising a closely related person.
- Outside employment eg: having a second job which has the potential to prevent you from fulfilling your duties to the organisation.
- Ownership or financial interest of an external organisation eg: owning a share of a supplier while in a position to steer THOR business towards it.
- Using company equipment or means to support an external business eg: using the company van to deliver your personal goods.
- Relationship with a supplier or customer eg: you have a family member who is at a level in the organisation that may give the appearance that it could affect your judgment, decisions, or actions in your dealings.
- External mandates eg: serving on the board of directors of another company.

Related Group policies:

- THOR Conflict of Interest Policy

Respecting Human Rights

What does it mean?

Treating everyone with dignity and respect and allowing freedoms that are expected in a modern society.

What do we believe?

We respect fundamental human rights and are committed to the principles set out in the United Nations Universal Declaration of Human Rights.

What are my responsibilities?

We abide by all local laws relating to employment terms and treat everyone with respect and dignity. When dealing with suppliers and other business partners we expect them to uphold these same principles.

Related Group Policies:

- Human Rights Policy
- Procurement Policy
- Group Sustainable Procurement Policy



Modern Slavery

What does it mean?

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

What do we believe?

We believe nobody should be subject to modern slavery, and we will not tolerate it in any business connection with us. We will not knowingly do business with any party involved in modern slavery.

What are my responsibilities?

We abide by international conventions and laws relating to modern slavery. We keep aware of our own work environment and that of our business partners to ensure that the company remains in compliance with its commitment to not knowingly engage in modern slavery.

Modern Slavery – Key Points

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.
- Human trafficking consists of three basic components: action, means and purpose of exploitation. All three components must be present in an adult trafficking case; for child trafficking the 'means' component is not required.
- In human trafficking cases, exploitation can take many forms, including sexual exploitation, forced labour, child labour, slavery, servitude, forced criminality and removal of organs.
- Some people may not be victims of human trafficking but still victims of modern slavery if they have been subject to slavery, servitude and forced or compulsory labour.
- Human trafficking is not the same as human smuggling.

  There are common myths about modern slavery, such as misconceptions that UK nationals cannot be victims and that a person cannot be a victim if they reject offers of help.

Related Group policies:

- Human Rights Policy
- Modern Slavery Policy

Social Dialogue and Working Conditions Commitments

Social Dialogue

THOR recognises that constructive social dialogue contributes to a positive, inclusive, and productive workplace.

We are committed to:

- Respecting employees' rights to freedom of association and collective bargaining in accordance with applicable laws and internationally recognized labor standards.
- Maintaining open, transparent, and regular communication between management and employees regarding workplace matters that may affect them.
- Providing appropriate channels for employees to express concerns, opinions, suggestions, and grievances without fear of retaliation, discrimination, or adverse consequences.
- Encouraging employee participation and consultation in decisions that impact working conditions, health and safety, wellbeing, and organizational development.
- Supporting a culture of mutual respect, trust, and cooperation between employees, employee representatives, and management.
- Ensuring that concerns raised through dialogue mechanisms are reviewed fairly, addressed promptly, and used to support continuous improvement.

Working Conditions

THOR is committed to providing fair, safe, and supportive working conditions for all employees worldwide.

We strive to:

- Provide employment conditions that comply with applicable labor laws, collective agreements where applicable, and internationally recognized labor standards.
- Promote fair treatment, equal opportunity, and non-discrimination throughout the employment lifecycle.
- Foster a healthy work environment that supports employee wellbeing, engagement, and professional development.
- Provide remuneration, benefits, working hours, rest periods, and leave arrangements that meet or exceed legal requirements.
- Support work-life balance through responsible workforce management practices and, where operationally feasible, effective flexible working arrangements.
- Maintain workplaces that protect employees' physical and psychological health and safety.
- Promote learning, training, and career development opportunities that enable employees to enhance their skills and professional growth.
- Regularly assess workforce-related risks and opportunities and implement actions aimed at improving employee satisfaction, retention, wellbeing, and overall working conditions.
- Monitor the effectiveness of our working conditions practices and seek feedback from employees to support continuous improvement.

THOR expects all managers and employees to uphold these commitments and contribute to a workplace culture founded on respect, collaboration, integrity, and continuous improvement.

Related Group Policies:

- Equal Opportunities Policy
- Learning & Development Policy
- Human Rights Policy
- Anti-discrimination & Harassment Policy



Fair Competition

What do we believe?

We believe that our business should compete in a lawful, fair, and ethical manner. We always compete for and do business solely on the basis of merit and open competition.

Dealing with customers

We deal fairly with our customers. We deal only in facts and are truthful when we discuss our product quality, purpose and availability.

We do not engage in tying of products by making a customer purchase one product to be allowed to purchase another.

Dealing with competitors

We do not engage with competitors to fix prices, undertake bid rigging, market allocation, control production or any other competition restricting action.

Likewise, we do not discuss our business and how we undertake that business with our competitors.

Market information

We gain market intelligence in accordance with the law, through legal means.
We never use deception or confidential information for competitive advantage.

- We must comply with THOR anti-trust and competition regulations policy and international and local laws relating to antitrust and competition.
- We must always deal fairly with everyone we come in to contact with or have a connection with as part of our business dealings; this includes our customers, suppliers and competitors.

Related Group policies:

- THOR Anti-Trust and Competition Policy



Trade Controls

What do we mean?

When exporting or importing goods or services we are subject to local and international laws. These laws dictate if and when we can export or import, and what permissions we require.

What do we believe?

We believe that all of our business operations should comply with applicable local and international trade law.

What are my responsibilities?

We understand that there are specific requirements for the export and import of goods and services between countries and that these may restrict the way we do business.

We make sure that if involved in the import or export of goods or services that these are done in compliance with international trade law.

We make sure that when exporting we know of our product's final destination and its intended use. We do not participate in shipping our products through one country to allow shipment to another if the shipment to either is against international trade laws.

Accurate Records

What do we mean

Business records are used to make public disclosures and provide information for production processes, customers, regulators and others. The company also makes important business decisions based on these records.

What do we believe?

We are trusted to keep accurate records of everything we do. We have a duty to ensure that information we gather and record is accurate, correctly recorded and retained.

What are my responsibilities?

We ensure that any records we are required to make are accurate and contain all necessary information. We are honest in what we record and do not hide or omit information to alter the recording process.

We do not dispose of records that are required to be retained or dispose of records that are or may be called for in any regulatory process.

We ensure that any records we are required to make are accurate and contain all necessary information.

These can include (but are not limited to):

- Financial records
- Permit records
- Environmental monitoring records
- Health and safety records
- Expense reports
- Production/quality records
- Shipping records
- Stock records
- Export and import records
- Customer records
- Supplier records
- Facility records

Related Policies:

- Classification of Information Policy

SAFEGUARDING OUR ASSETS



At THOR, we recognise that our assets, information, and technology are essential to how we operate. We are committed to protecting these assets by using them responsibly, securely, and ethically.

Everyone has a role in safeguarding company information, maintaining confidentiality, and ensuring our digital tools are used appropriately.

What does it mean?

Information technology - includes all computer devices and infrastructure including mobile devices, computer networks, computer information management services, cloud services, software & related licenses, removable storage media and emerging technologies.

What do we believe?

We aim to provide up to date information technology that promotes collaboration and innovation and enhances the experience of anyone working for, or doing business with, THOR.

We believe that everyone should use these assets responsibly.

Business use

We always follow all security measures for our information technology assets, this includes using only IT approved software, locking devices when not in use, regular cyber security training, password protecting removable media devices and never disclosing our passwords to unauthorised persons.We never use our information technology assets in circumstances that are against the law or good business ethics.

Personal use

We will not allow personal use of computer information technology to interfere with our work (or anyone else's), or use it in circumstances that are against the law or good business ethics.

We shouldn't be using company information technology assets in the following ways:

- For personal gain or that of another person or organisation.
- Accessing, downloading or sending inappropriate, sexually explicit, illegal or offensive material.
- Undertaking any activity that may be contrary to the THOR Anti-Discrimination and Anti-Harassment Policy.
- Downloading or using unlicensed software.
- Downloading of any licensed software without local IT Team supervision.
- Using information technology and/or associated products in non-compliance with applicable licensing, copyright, notices, contracts, agreements, regulations, sanctions or trade control laws.
- Duplicating, publishing or distributing copyrighted materials to which you have no right. This may include (but is not limited to), downloading songs, photographs and videos.
- Disclosing confidential information to those not authorised to receive it.
- Using an organisation email address to register on websites that are not connected with the organisation eg: social media, online auction, gambling or similar websites.

Related Policies:

- Group IP Policy



Social Media

What does it mean?

Social media - consists of web-based communication tools such as websites and applications that enable users to create and share information or to participate in social networking.

What do we believe?

We believe in the right of every individual to use social media for private purposes. At the same time it is important that employees and others associated with the organisation understand the implications of online communication that references the company or something associated with it.

Business use

We are only allowed to post to social media using a THOR account if we are authorised to do so. When posting we follow the guidance contained in the THOR Social Media policy.

Personal use

We never give the impression that our views or opinions are those of THOR or that we are a company spokesperson speaking on THOR's behalf. We never disclose THOR confidential information and always remember that what we post can have lasting effects on both ourselves and others.

Even posts that we intended to be restricted to family and friends may end up forwarded - sometimes globally. These posts can then be read by anyone including fellow employees, management, customers, suppliers, regulators etc.

When using social media for private purposes, we should:

- Adhere to the Code of Conduct and all other company policies.
- Make it clear that any comment we make is ours alone, using 'these are my personal views' could be helpful.
- Never post non-public company information or non-public information relating to other employees, customers, suppliers, or anyone or anything connected with the organisation.

A good rule is - If in any doubt do not post.

Related Policies:

- Group Social Media Policy

External Communications

What does it mean?

We are often contacted for information or comment from external parties such as regulatory agencies, media organisations, partners, or individuals.

We recognise the importance of providing accurate, consistent, and appropriate information that reflects THOR's values and protects our reputation.

What do we believe?

We believe in giving consistent, accurate information when it is in our business interest or legally required, while maintaining transparency and accountability.

Incorrect information or confidential information shared at the wrong time or to the wrong outlet can have serious implications for the company.

What are my responsibilities?

We do not disclose confidential business information, give comments to the media about any aspect of the company or provide information to any other external parties unless we are authorised to do so.

Authorisation can only be given by respective Managing Directors or other senior board members.



Confidential Information

What does it mean?

We have large amounts of confidential information which can come in many different modes.

Confidential information can include; patents, copyrights, trade secrets, engineering plans, business ideas, business plans, customer/supplier lists.

All of these include information we own and information that may be supplied to us by customers and other business partners.

What do we believe?

We believe that confidential information should remain confidential. When you protect our confidential information, you protect our assets and our competitive advantage.

What are my responsibilities?

We do not disclose confidential information unless authorised. We take care of confidential information and are careful where we discuss it, disclose it or access it.

Related Group Polices:

- Intellectual Property Policy
- Classification of Information Policy

Data Privacy

What does it mean?

We often have access to personal information that can identify an individual. This may include their name, address, telephone number, email address, or other personal data. Data privacy laws and regulations govern how this information is collected, used, shared, stored, and disposed of.

What do we believe?

We believe that we should always aim to collect and process personal data in accordance with applicable laws, regulations and best practice. Managing personal data responsibly is fundamental in maintaining trust.

What are my responsibilities?

We only collect, access, use, or disclose personal data for appropriate business purposes if we are authorised to do so. When we collect personal data, we only collect what is necessary and ensure it is handled responsibly.

We do not share personal data with anyone who is not authorised to receive it. In addition, we do not access personal data unless we are authorised to and have a legitimate business reason to do so.

At all times, we safeguard personal data and take appropriate measures to protect its confidentiality and security.

When we deal with personal data we must always:

- Inform individuals that we want to collect and use their data. Always be transparent as to what we will collect and what we will use it for and never collect what we do not require.
- Ensure that all data held is correct and up to date.
- Access personal data only if we are authorised to do so.
- Never share data with others unless we are authorised to do so and they are authorised to receive it.
- Keep personal data safe and secure. Any data we release to third parties must be covered by the same standards contained within our Code of Conduct.
- Ensure that data transfers meet the legal requirements of the country where it is handled. International transfers must meet the legal requirements of both the country it leaves and the country where it is sent.
- Meet the legal requirements for retention of data and only keep data for the purpose for which it was intended and for as long as it is required. Data should always be disposed of correctly.
- Meet the requirements for personal requests to access data held on an individual within the timescales set by local legal requirements.
- Report breaches of data privacy rules contained within the Code of Conduct or other requirements to our local HR Management immediately.

Safeguarding Our Assets



THOR expect extraordinary

OUR PURPOSE

To create lasting solutions that enable the extraordinary.

OUR VALUES

Solve with ingenuity. Deliver with integrity.