

Spectris believes in the fundamental rights of people in all parts of the world and is committed to adopting internationally recognised human rights standards wherever it operates. The company's human rights policy is consistent with the Principles of Human Rights, as set out in the International Labour Organization's core conventions. The Chief Executive has overall responsibility for human rights.

Policy

It is the group's policy that all operating companies:

- > adhere to all legislation relating to employment rights and equal opportunities, with particular reference to non-discrimination on the basis of ethnic origin, colour, religion, gender, age, marital status, disability, sexual orientation or military veteran status;
- > ensure that physical, verbal and psychological abuse, or sexual or other forms of harassment towards employees is not tolerated;
- > ensure that disabled persons are recruited, trained and promoted on the basis of aptitude and ability. If employees become disabled, every effort is made to retain them and when necessary re-train them for appropriate posts;
- > pay wages and benefits which meet or exceed national minimum requirements and adhere to working time regulations where applicable;
- > shall not use forced labour nor employ workers under the school-leaving age of the country of employment. Appropriate procedures are taken where practicable to ensure that this policy is applied to suppliers;
- > provide a safe and secure workplace and promote good health and safety and environmental practices;
- > adhere to applicable laws regarding the freedom of employees to associate or bargain collectively without fear of discrimination.

Spectris takes its commitments to human rights seriously and our operating companies are required to ensure that all employees are aware of the policy and understand it. In most of the operating companies, new employees are provided with an employee handbook which includes sections on employee responsibilities with regard to equal opportunities, non-discrimination, harassment, bullying, disciplinary practices, etc, and new employees must sign to say that they have read and understood this. The Code of Business Ethics also contains a section on human rights and employees are required to ensure that all company operations adhere to these important standards. Pay practices are monitored to ensure they are non-discriminatory.

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The region president is responsible for ensuring that the highest ethical standards are maintained in all of our Asia-based operations. Spectris has a number of sales offices in China and also factories which supply high quality weighing components and particle characterisation instruments. These comprise modern facilities, employ skilled workers, adopt employment conditions consistent with best local practice, and pay wages that are higher than average for the area.

Spectris considers human rights as part of its due diligence process for acquisitions, ensuring that the core labour rights, including non-discrimination, equal opportunities and freedom of association, of the company to be acquired are taken into account.

Ethics

Our core values – honesty, empowerment, ownership, delivery and speed – underpin the way we work and are set out in our Code of Business Ethics (the “Code”), which is available on our website. The Code applies to all employees of Spectris and is available in all 15 languages relevant to our operations. It provides a clear framework for how we do business and includes policies on anti-bribery and corruption, dealings with customers, suppliers and colleagues, conflicts of interest, and human rights. All employees have participated in a training course and received a printed copy of the Code, and each operating company has a nominated Ethics Compliance Officer who is responsible for ensuring compliance in their business. Compliance is also monitored by the internal audit function as part of the risk assessment process.

On-line training modules supporting the ethics programme were introduced during 2010 and further modules will be implemented in 2011.

All operating companies are required to comply with export control regulations governing shipment of products and the appropriate compliance procedures are in place. Our export control policy can be viewed on our website.

Employees are encouraged to report any concerns they may have over fraud, including bribery and corruption, unethical business practices or conduct, dangers to health and safety, or breach of company policies, via the group’s “whistle-blowing” policy. This is supported by a telephone and internet-based multi-lingual hotline enabling employees and others to report concerns, anonymously if they wish. All whistle-blowing reports are summarised for the audit committee on a six-monthly basis. In the past 12 months the hotline has been used on a number of occasions and the reports followed up to a successful conclusion. Spectris is committed to protecting the career and reputation of employees who report wrongdoing in accordance with established procedures, so long as their disclosures are delivered in good faith and seek to safeguard the best interests of the group.