AMS Composite Cylinders

The Quadrant, 99 Parkway Avenue, Sheffield, S94WG.



Compliance and Integrity Policy

1.0 Policy Statement

AMS Composite Cylinders is committed to and conducts its business activities lawfully and in a manner that is consistent with its compliance obligations.

This Legal and Regulatory Compliance Policy (Compliance Policy) establishes the overarching principles and commitment to action for AMS Composite Cylinders with respect to achieving compliance by:

- identifying this compliance policy within which AMS Composite Cylinders operates
- promoting a consistent, rigorous and comprehensive approach to compliance throughout AMS Composite Cylinders
- developing and maintaining practices that facilitate and monitor compliance within AMS Composite Cylinders
- seeking to ensure standards of good corporate governance, ethics and community expectations
- engendering a culture of compliance where every person within AMS Composite Cylinders accepts personal responsibility for compliance and acts ethically and with integrity

2.0 Scope

This policy applies to AMS Composite Cylinders' directors and employees, and to all contractors working for or at AMS Composite Cylinders (our people). AMS Composite Cylinders' legal and regulatory compliance obligations include:

- Legal obligations, including:
 - o contractual
 - o permits, licences and other forms of authorisation
 - o common law
 - o relevant industry codes and compulsory standards
- External obligations, including regulatory policies and codes
- AMS Composite Cylinders policies, procedures and guidelines.

Detailed operational procedures support AMS Composite Cylinders' legal and regulatory compliance obligations.

3.0 Policy Overview

AMS Composite Cylinders' Compliance Policy is based on the best practice standards and principles and recognises that there are four elements for an effective compliance program:

- Commitment AMS Composite Cylinders' commitment to, and the establishment of, a compliance program
- Implementation AMS Composite Cylinders' implementation of a compliance program, including ongoing education and maintenance
- Monitoring reporting and supervision of the compliance program
- Continual Improvement regular review and continual improvement of our compliance policy

AMS Composite Cylinders

The Quadrant, 99 Parkway Avenue, Sheffield, S94WG.



4.0 Compliance Program

The AMS Composite Cylinders compliance program includes:

- a consistent and effective process for identification, assessment, management, reporting, review and monitoring of compliance obligations and issues
- where appropriate, integration with the Corporate Risk documents
- a training program, including induction training
- cyclical reviews of content and the program to continuously identify improvement opportunities.

Compliance Reporting

The compliance program enables regular efficient and effective reporting to the Board regarding AMS Composite Cylinders' compliance obligations.

Full details of all AMS Composite Cylinders compliance issues (including breaches) are retained in the CAPA records.

Compliance Education and Training

The compliance program promotes awareness of compliance through facilitation of training and education of our people regarding AMS Composite Cylinders' compliance program and compliance obligations.

Continuous Improvement

AMS Composite Cylinders' compliance program and compliance performance is regularly monitored, measured and reported at Board meetings. As part of continuous improvement, this policy may be amended for approval by the Board.

5.0 Responsibilities and Authorities

In accordance with AMS Composite Cylinders' Code of Conduct, it is the responsibility of all AMS Composite Cylinders Directors and employees and all contractors working for or at AMS Composite Cylinders sites to comply with the law, AMS Composite Cylinders' contractual commitments and AMS Composite Cylinders' policies and procedures.

The Board

The AMS Composite Cylinders Board has ultimate responsibility for legal and regulatory compliance and is charged with overseeing, reviewing and ensuring the effectiveness of AMS Composite Cylinders' compliance systems. The Board is advised regularly on compliance related issues including any compliance breaches.

Directors

Directors are responsible for ensuring effective implementation and maintenance of this Compliance Policy and that all our people adhere to the associated systems and guidelines. Directors are responsible for the regular reporting of the status of controls, compliance breaches and their improvement to the Board.

AMS Composite Cylinders

The Quadrant, 99 Parkway Avenue, Sheffield, S94WG.



Our people

Our people have a responsibility to ensure that their activities on behalf of AMS Composite Cylinders comply with all applicable legal and external obligations and AMS Composite Cylinders procedures and in line with the Compliance Policy Awareness Document

6.0 Review and Consultation (Prior to Approval)

This document is required to be reviewed by the Board, as a minimum, every three (3) years.

7.0 Communication Plan (After Approval)

This Compliance Policy will be communicated using education and training as detailed above

This Compliance and Integrity policy was written by: Tony Morrin

Position: Director
Date: 04 Dec 2019

Signature: