

Tower Leasing Limited's Code of Ethics and Business Conduct serves as our ethical commitment to doing business legally, ethically and in a transparent manner. All staff are expected to adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty, and fairness. We expect all those in our business dealings to support and comply with our values.

Compliance with Laws and Regulations:

Tower Leasing limited strive to do business legally, ethically and in a transparent manner through upholding all laws in all the jurisdictions in which we conduct business.

Treating Customers Fairly (TCF):

Tower Leasing are committed to ensuring that our customers and staff are treated fairly at all times. We aim to ensure our service is always to a high standard and where errors occur, we look to learn from them. Our TCF policy is structured according to the guidance provided by the Financial Service Authority to ensure we deliver fair outcomes to our customers based upon a culture of openness and transparency.

Privacy, personal data protection:

We respect people's privacy and are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity and availability of personal information.

Bookkeeping, true reporting and financial integrity:

Our books, records, accounts and financial statements must be maintained in appropriate detail, must truly and properly reflect our transactions. We condemn all forms of money laundering, so we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

Anti-Fraud:

The act or intent to cheat, steal, deceive or lie – is both unethical and, in most cases, criminal. Fraud in every form, (including e.g. submitting false expense reports; forging or altering financial documents or certifications; misappropriating assets or misusing company property; making any untrue financial or non-financial entry on records or statements) is prohibited.

Anti- Bribery & Corruption:

Tower Leasing Limited has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

Whistleblowing:

Whistleblowing is protected by law under the Public Interest Disclosure Act 1998. Tower views the act of whistleblowing in a positive light and will work to protect the identity and reputation of any person who comes forward to report actual or suspected illegal activities

Conflicts of Interest:

Conflicts of interest can be avoided or addressed when promptly disclosed and properly managed. Tower have conflicts of Interest register and expect all employees to be alert to any conflicts of interest and understand that they are responsible for reporting any actual or potential conflicts of interest in a timely manner our nominated officer

Gifts & Hospitality:

Tower shall avoid any actions that create a perception that favourable treatment was sought, received, or given in exchange for personal benefits.

Equality, Diversity & Inclusion:

Tower understands that everyone is different and have unique qualities to offer. We seek to respect and understand these differences, so we can make the most of everyone's talents, to the benefit of individuals and the business as a whole. To this end, Tower is committed to the promotion of equal opportunities throughout its business and fully comply with our obligations under the Equality Act (2010)

Anti-Slavery & Human Trafficking:

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company. Tower Leasing Limited has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

Fair Labour Practices & working conditions:

Tower are committed to promote equality in our employment practices and to fair employment and remuneration. We are firmly opposed to employ or contract child or slave labour or any form of forced or compulsory or bonded labour. We condemn all forms of illegal, unfair, unethical labour practice that exploits workforce, or serves as tax evasion

Health & Safety:

We provide clean, safe and healthy work conditions and we are dedicated to maintaining a healthy working environment.

For more details on Tower's Code of Ethics, please refer to our Code of Ethics Policy.