

	Ref No. BEI	<b>BUSINESS ETHICS &amp; INTEGRITY POLICY STATEMENT</b>
	Issue No. 05	

## Ethics in the Workplace

Beardwell Construction Ltd are committed to 'doing business' in an ethical manner. We believe that if we are not open and honest in our business dealings our company will not flourish and will ultimately fail. Embedded in our Core Values is that of honesty. We firmly believe that this is the best policy. Trust is something that has to be earned and can only be achieved by demonstrable behaviour and action.

In accordance with this Policy we will:

- Foster and build trust with all our stakeholders.
- Encourage staff to challenge themselves and others if they believe that they may be or are behaving unethically.
- Raise awareness of fair and ethical trading amongst Beardwell's staff, clients, suppliers, sub-contractors, business and joint venture partners.
- Not put pressure on our staff to behave in an unethical manner in order to meet business requirements.
- Encourage a supportive culture where in association with our stakeholders we can openly discuss difficult issue which can then be resolved.
- Encourage a culture where any concerns regarding unethical behaviour by colleagues or stakeholders can be reported to a board Director.
- Ensure that Beardwell's business endeavours are conducted for all of its business activities within the scope of the Ethical Trading Initiative base-code.

## Codes of Conduct

Beardwell Construction Ltd adopts the following Codes of Conduct: -

### **Safety, Health & Environment**

This is fundamental to all our operations and we have a comprehensive health & safety and environmental policy and procedures.

### **Confidentiality**

We respect the need to keep certain information confidential to the company and identify information which may not be disclosed, communicated or used upon leaving the company. Retention of confidential information includes that relating to suppliers, customers, prospective customers.

### **Conflicts of Interest**

We require our employees to perform their duties honestly and to avoid conflict between any personal financial or commercial interests and their responsibilities to Beardwell Construction. Any potential conflicts of interest shall be declared to a Director.

### **Alcohol & Drugs Misuse**

We have a policy which defines our stance to substance abuse or misuse.

### **Public Interest Disclosure**

This is commonly known as 'Whistleblowing'. This policy provides a confidential and secure means to enable our employees or others to raise concerns about conduct which is contrary to our values. We are committed to protecting any employees who reports a breach of the policy of Ethics in the Workplace.

### **Competition Law Disclosure**

We are entirely supportive of open and fair competition and are committed to adhering strictly with all competition laws. We do not condone any activity which might unfairly restrict the level of competition expected by our customers.

### **Gifts & Hospitality**

These may be permissible if not excessive or hidden and must not compromise in any way the Competition Law code of conduct.

### **Bribery**

This is not tolerated. No representative of Beardwell Construction may offer or receive any benefit, financial or otherwise in return for a benefit or gain to themselves or the company.

### **Equal Opportunities**

We promote equality in the workplace and are keen to eliminate all forms of unfair discrimination.

### **Dignity at Work**

We respect human dignity and the rights of individuals.

### **Disciplinary & Grievance**

We have defined procedures in relation to disciplinary action together with how grievances should be managed.

### **Training & Staff Development**

All staff are made aware of our policies at least on an annual basis and will receive specific training should this be deemed appropriate.

These Codes of Conduct are also included with our Staff handbook.

## Business Integrity

Beardwell Construction adopts the following business integrity standards: -

- A Health & Safety Policy & Management System

- An Environmental Policy & Management System
- A Quality Assurance Policy & Management System
- A Training & Development Policy & Management System
- An Equal Opportunities Policy
- This Business Ethics and Integrity Policy
- Meet all legislative requirements

Beardwell Construction will, in partnership with its suppliers, implement this code of conduct as a shared responsibility. Our principals for operating this code will be: -

- A duty to provide training
- A duty to communicate its commitment to employees and suppliers



Duncan Clark  
Managing Director  
Beardwell Construction Ltd  
8<sup>th</sup> January 2025