

# Ethics Policy

## 1. Purpose

- 1.1 EE Smith Contracts Limited ("the Company") is committed to the practice of responsible corporate behaviour.
- 1.2 Through its business practices, the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents.
- 1.3 Further the Company is committed to protecting the rights of all those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company.
- 1.4 The Company is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with the Company adhere to this policy and abstain from giving or receiving bribes of any form.

This policy is non-exhaustive, and all aspects of the Company's business should be considered in the spirit of this policy.

## 2. Human Rights

- 2.1 The Company is vehemently opposed to the use of slavery in all forms; cruel, inhuman, or degrading punishments; and any attempt to control or reduce freedom of thought, conscience, and religion.
- 2.2 The Company will ensure that all of its employees, agents and contractors are entitled to their human rights as set out in the Universal Declaration of Human Rights and the Human Rights Act 1998.
- 2.3 The Company will not enter any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or who breach the human rights of those affected by the organisation's activities.

## 3. Workers' Rights

- 3.1 The Company is committed to complying with all relevant employment legislation and regulations. The Company regards such regulations and legislation as the minimum rather than the recommended standard.
- 3.2 No worker should be discriminated against based on age, gender, race, sexual orientation, religion or beliefs, gender reassignment, marital status, or pregnancy. All workers should be treated equally. Workers with the same experience and qualifications should receive equal pay for equal work.
- 3.3 No worker should be prevented from joining or forming a staff association or trade union, nor should any worker suffer any detriment because of joining, or failing to join, any such organisation.
- 3.4 Workers should be aware of the terms and conditions of their employment or engagement from the outset. In particular, workers must be made aware of the wage that they receive, when and how it is to be paid, the hours that they must work and any legal limit which exists for their protection and any overtime provisions. Workers should also be allowed such annual leave, sick leave, maternity / paternity leave and such other leave as is granted by legislation as a minimum.
- 3.5 The Company does not accept any corporal punishment, harassment in any form, or bullying in any form.

## 4 Environmental Issues

- 4.1 The Company is committed to keeping the environmental impact of its activities to a minimum and has established an Environmental Policy in order help achieve this aim. Copies of the Environmental Policy are available from Human Resources.
- 4.2 As an absolute minimum, the Company will ensure that it meets all applicable environmental laws in whichever jurisdiction it may be operating.

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## 5 Conflicts of Interest

- 5.1 The Company holds the trust and confidence of those with whom it deals, including clients, suppliers, and employees as fundamental to its success. Conflicts of interest potentially undermine the relationship of the Company with its partners.
- 5.2 To help preserve and strengthen these relationships the Company has developed an Anti-Bribery & Corruption Policy, which provide rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption. Copies of the Anti-Bribery and Corruption Policy are available from Human Resources.
- 5.3 All officers, employees and representatives of the Company are expected to act honestly and within the law.

## 6 Information and Confidentiality

- 6.1 Information received by employees, contractors or agents of the Company will not be used for any personal gain, nor will it be used for any purpose beyond that for which it was given.
- 6.2 The Company will process any personal data collected in accordance with its Data Protection Policy.

## 7 Shareholders and Investors

- 7.1 The Company, its officers, employees, and representatives are committed to ensuring that no act or omission which is within their power, and which would have the effect of deliberately, negligently, or recklessly misleading the shareholders, creditors or other investors in the Company occurs.

## 8 Suppliers and Partners

- 8.1 The Company expects all suppliers and partners to work towards and uphold similar ethical and moral standards.
- 8.2 The Company will investigate the ethical record of potential new suppliers before entering into any agreement. Further, the Company reserves the right to request information from suppliers regarding the production and sources of goods supplied.
- 8.3 The Company reserves the right to withdraw from any agreement or other arrangement with any supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

## 9 Bribery and Corruption

- 9.1 The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.
- 9.2 Employees and any other persons associated with the Company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.
- 9.3 All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy available from Human Resources.
- 9.4 If an individual reports suspected instances of bribery, the Company will process any personal data collected in accordance with its Data Protection Policy. Data collected will be held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the report of bribery.
- 9.5 Should any employee or associated person be in doubt when receiving or issuing gifts and hospitality, he/she must refer to the Anti-Bribery and Corruption Policy available from Human Resources.
- 9.6 The Company uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.

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- 9.7 If an employee or associated person is found guilty of giving or receiving a bribe, he/she will be personally criminally liable and may be subject to disciplinary action.
- 9.8 Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

## Policy Review

This Ethics Policy will be regularly reviewed and updated by the Human Resources Manager as necessary.

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## **Policy Review**

This Ethics Policy will be regularly reviewed and updated by the Human Resources Manager in line with the schedule below:

<b>Policy Title:</b>	Ethics Policy	
<b>Policy Creation Date:</b>	28/11/2023	
<b>Policy Creator:</b>	HR Manager	
<b>Policy Review Date:</b>	28/11/2025	
<b>This Policy has been approved and authorised by:</b>		
<i>Neil Bottrill Managing Director</i>		<i>Neil Simpson Finance Director</i>
<i>Date:</i>	<i>Date:</i>	

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## Ethics Commitment Statement

EE Smith Contracts Limited are committed to always upholding the highest standards of ethics, aiming beyond what we should do as a business to further our industry, support our people, and nurture long-lasting relationships with our supply chain partners and clients.

Our Ethics Commitment Statement articulates what we are doing to uphold our values and challenges those who fail to meet our high standards.

We take a zero-tolerance approach to bribery and corruption and conduct our business operations in an open and transparent manner. We promote a culture in which we encourage our people to speak up without fear of retribution. We are open to collaborating with industry bodies to proactively tackle industry wide issues such as modern slavery and corruption with further information contained within our:

- Modern Slavery Policy
- Whistleblowing Policy

Through our Every Employee Supported ethos, we pride ourselves on our integrity, operating in an open and transparent way and treating people fairly and with respect. We believe that being inclusive and nurturing a multitude of talents and skills will help us to continue our reputation in 'setting the standard'. The dignity of all of our people and those that make up our supply chain partners is of paramount importance to us. We believe that no-one person is greater than another and we strive to ensure an inclusive culture that promotes and protects the diversity and human rights of everyone.

Further information that demonstrates our commitment can be found in our:

- Equal Opportunities Policy
- Health, Safety and Wellbeing Policy
- Drug and Alcohol Policy
- Apprentice Safeguarding Policy

We aim to make a positive impact on our environment and the communities in which we operate. We intend to make wider contributions to society through social investment through charitable endeavours, sustainability efforts, and long-lasting relationships. We are committed to maintaining our ISO: Environmental Management System Accreditation.

Further information that demonstrates our commitment can be found in our:

- Environmental Policy
- ESG Policy

Signed for and on behalf of the Company.

**Neil Bottrill**  
**Managing Director**

**Date:**