



## **R. Betts Construction Ltd**

### **Policy For Corporate Social Responsibility & Code of Conduct**

***Who does this code apply to?*** - It applies to all employees, sub-contractors and stakeholders engaged with R. Betts Construction Ltd.

***Who is responsible?*** - Leadership regarding the requirement of the code is provided by management, but everyone engaged by the company is responsible.

***Concerns*** – If you have any concerns over something which may not be consistent with our code or any other company policies, speak, in confidence to a member of the management team who will be able to deal with your concerns. Retaliation or discrimination to any company stakeholder will not be tolerated and we will act against it to protect those who do the right thing in good faith.

***Who should you contact?*** - You should talk directly to the person responsible, if that is appropriate, if not, your site supervisor will address your concerns.

### **Company Principles**

Listed below are the company's core principles which define your conduct. Deviation from these principles will seriously damage the reputation and integrity of the company and its ability to secure future work.

If you think it is wrong, it probably is. If you are unsure, ask.

***Integrity and Professionalism*** – Our business is committed to maintaining a reputation for integrity professionalism and transparency throughout. This commitment applies to all employees, subcontractors, suppliers and extends to all other stakeholders. Breach of any code or company policy will seriously damage the company's integrity and reputation with its stakeholders, and be detrimental to future business.

***Fraud*** - We will not defraud, deceive or act dishonestly to any company stakeholder

***Bribery*** - We refuse to offer, give or receive bribes or improper payments or enter in to any corrupt activity either directly or through third parties.

***Facilitation Payments*** - We will not make facilitation payments of any kind no matter how large or small. Facilitation payments are in essence the same as bribes and as such will not be tolerated.

***Gifts and hospitality*** – These can only be offered or received if they are reasonable, offered in good will so as to not improperly influence but to enhance business relationships.

***Conflicts of Interest*** – These usually involve direct or indirect personal gain from a third party, which can potentially compromise judgement with regard to company business. With the exception of reasonable gifts and hospitality, if you, your family or friends will gain personally from potential engagement with a third party, it is a conflict of interest and will be in breach of our code.



**Open and Fair Competition** – We believe in open and fair completion between our suppliers and subcontractors and as such we will refrain from divulging sensitive information with regard them. We will not enter into any kind of agreement with competitors in relation to price fixing, market share or any other matters which may contravene competition or anti-trust laws.

**Training and Development** – We are committed to engaging people who will uphold our values and code of conduct. We will provide a safe and supportive environment for them to achieve their best. We are committed to their training needs for continual improvement. We will not deny opportunities through any form of discrimination.

**Equal Opportunity** – We are committed to employ, train and promote solely on the basis of personal merit and contribution. This is to ensure fairness and act against all forms of discrimination. We will maintain a supportive working environment free from discrimination, harassment and bullying.

**Harassment, Bullying and Discrimination** – We will not tolerate any form of harassment, bullying or discrimination against anyone stakeholder of the company. If such behaviour is observed it should be challenged appropriately or reported to a supervisor, who will deal with the matter in accordance with company disciplinary procedures, should they be required.

**Human Rights** – We are committed to observing, protecting and to uphold the rights of all those who work for or with us, along with the communities in which we operate.

**Company Property** – We are committed to provide the appropriate environment and equipment throughout the business to enable those engaged by the company to work efficiently, effectively and safely. Observations of damage, misuse or theft should be challenged if appropriate, or escalated in confidence to a supervisor.

**Personal Information** – We are committed to the protection of personal information, to use it as it was intended and not to distribute that information without legitimate reason or consent.

**S. Halliwell**  
**Director.**  
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