

Supplier and Sub-Contractor Code of Conduct

1 Introduction

- 1.1 This document outlines the standard of behaviour we expect from our supply chain. It applies to our immediate suppliers and sub-contractors, as well as expecting the same standard of behaviour from any business used in the supply chain of our suppliers and sub-contractors.
- 1.2 This is a Group document and relates to Alfred Bagnall & Sons Limited and all its subsidiary companies including the following:
- a) Alfred Bagnall & Sons (Administration) Ltd
 - b) Alfred Bagnall & Sons (East Midlands) Ltd
 - c) Alfred Bagnall & Sons (Leeds) Ltd
 - d) Alfred Bagnall & Sons (London) Ltd
 - e) Alfred Bagnall & Sons (Midlands) Ltd
 - f) Alfred Bagnall & Sons (North East) Ltd
 - g) Alfred Bagnall & Sons (North) Ltd
 - h) Alfred Bagnall & Sons (North West) Ltd
 - i) Alfred Bagnall & Sons (Restoration) Ltd
 - j) Alfred Bagnall & Sons (South Wales) Ltd
 - k) Alfred Bagnall & Sons (West) Ltd

2 Our Values

- 2.1 Our Company values at Bagnalls are crucial to the way in which we conduct business. We want to work with organisations who uphold our values and contribute positively to the way we work with our customers. In particular, we want to see the four values below demonstrated by our suppliers and sub-contractors:
- a) *Fairness*: we will be fair to our suppliers and sub-contractors and pay in line with the agreed payment terms. We expect our suppliers and sub-contractors to treat those in their supply chain fairly and not to delay or decrease payment unreasonably. We also expect our suppliers and sub-contractors to treat their employees fairly, including paying a fair wage and not discriminating against them.
 - b) *Honesty*: We will be honest with our suppliers and sub-contractors. We expect them, in turn to be honest with us, including reporting any issues or accidents to us promptly. We will not tolerate bribery and corruption in our dealings with our supply chain and expect you to be robust in preventing this within your supply chain.
 - c) *Reliability*: We take pride in delivering an excellent standard of customer service and believe this sets us apart from our competitors. We can only offer this if we work with a reliable supply chain who deliver on their promises.

- d) *Safety*: This is our number one priority at Bagnalls and we expect this to be your priority when working on site with Bagnalls. We expect you to work to our standards of health and safety and instil in your workforce and supply chain a culture of everyone taking responsibility for their own safety, and that of those around them. You need to make sure that people know how to report issues relating to safety and have processes to allow people to report poor safety practice.

2 What to do if you have a Serious Concern

- 2.1 If you have a serious concern about something which you feel is inconsistent with this Code please let us know. You can raise your concerns in confidence. We will support you, even if you turn out to have been mistaken, as long as you had an honest belief that the issue you raised was true.
- 2.2 You should speak directly to the Branch Manager of the branch for whom you are working to raise your concerns initially. If you do not feel this is the appropriate method to raise your concern, you can contact whistle@bagnalls.co.uk. This email address is monitored by Directors of the Company.
- 2.3 You need to ensure that you have systems in place that allow your employees and your supply chain to let you know directly about any issues which are not in line with this code. This could be a whistleblowing email address or phone number.

3 Fraud, Deception and Dishonesty

- 3.1 It is fraud if you try to deceive someone or act dishonestly to gain an advantage. You must make sure you do not let your employees, or your supply chain commit fraud. You should be aware that you could be prosecuted for failing to prevent fraud.
- 3.2 You must not steal from our Company or from our customers or third parties.
- 3.3 You must be accurate in your claims to us for services or materials provided, including any time recording.
- 3.4 You must not knowingly conceal defects.
- 3.5 You must make sure you comply fully with your tax obligations. We will not facilitate tax evasion.
- 3.6 You must speak up if one of our employees asks you to act fraudulently.

4 Bribery and Corruption

- 4.1 A bribe is something of value, including cash, gifts, entertainment or hospitality as encouragement or reward for acting improperly in the expectation that a business advantage will be provided. This does not include small, low value gifts, and reasonable hospitality.
- 4.2 You must make sure that your employees understand their obligations and do not offer or accept bribes from your customers (including Bagnalls' employees), or anyone within your supply chain.

4.3 You must speak up if one of our employees offers you a bribe.

5 Human Rights, Labour Conditions, and Modern Slavery

5.1 We do not tolerate forced labour or human trafficking. You should be aware that the construction industry is a high-risk area for trafficking and therefore take steps to prevent it.

5.2 You are responsible for ensuring that those working for you and in your supply chain have the right to work in the UK and are legally employed and paid.

5.3 We expect you to train your employees so that they recognise the signs of forced labour and human trafficking and know how to report any suspicions.

5.4 It is important that you vet recruitment agencies before using them to supply you with labour. You must ensure they have undertaken the necessary right to work checks on your behalf.

5.5 You must pay your employees fairly. We encourage companies within the construction industry to work to the terms and conditions outlined in the Construction Industry Joint Council (CIJC) Working Rule Agreement. We also encourage companies to pay the Living Wage.

5.6 You must meet the legal requirements regarding working hours and make sure that people are not working excessive hours to the extent that their safety on site may be impaired.

5.7 You must speak up if you are aware that someone on site is working illegally or has been trafficked.

6 Bullying, Harassment and Discrimination

6.1 Bullying and harassment are actions or behaviour that an individual or group finds unwelcome, humiliating, threatening, violent, intimidating, or discriminatory.

6.2 Discrimination refers to treating an individual or group less favourably based on factors such as gender, race or ethnic origin, religion, sexual orientation, gender reassignment, marital status, or disability.

6.3 You must not treat somebody less favourably based on them being a member of a trade union (or not being a member of a trade union). We will not tolerate the use of databases which 'blacklist' individuals based on union activity.

6.4 We expect you to take steps to eliminate bullying, harassment, and discrimination within your organisation. You must also make sure your employees and those acting on your behalf do not bully, harass, or discriminate against our employees or customers.

6.5 We encourage organisations to take a positive approach to employing people with disabilities. We ask you to make reasonable adjustments to allow disabled people to enter your workforce. We are happy to discuss how we can support your employees with disabilities to work on our sites.

6.6 You must speak up if you witness any acts of bullying, harassment, or discrimination on our sites, including where one of our employees is responsible for the act.

7 Occupational Health and Safety

7.1 Occupational Health and Safety is our number one priority. We expect it to be yours too.

7.2 You must ensure you are aware of your obligations under the Health and Safety at Work Act 1974.

7.3 You must be fit to work. We have a zero-tolerance approach to people working on our site under the influence of illegal drugs or alcohol. Those taking prescription medication must seek medical advice about the impact of their drugs on their ability to work safely on site.

7.4 You must attend a site induction before you commence work. You must follow the instructions you are given in the contract phase plan (CPP). If anything changes you must stop work.

7.5 You must report any accidents, undesired circumstances or near misses, including unsafe conditions.

7.6 You must speak up if you are asked to do something that would be unsafe for you or for others.

8 The Environment

8.1 We want to minimise the impact of our activities on the environment. We encourage our supply chain to use materials and resources responsibly, and, wherever possible, reducing consumption, reusing items, and recycling.

8.2 You must take appropriate steps to ensure that the environment is not damaged by your activities.

8.2 We do not tolerate illegal disposal of materials, for example fly-tipping or disposal of paint or other waste products down drains.

8.3 We expect those working on our site to leave the site clean and tidy, and to make sure that materials do not represent a trip hazard or obstruct site exits. If you are a sub-contractor, you are responsible for disposing of rubbish from materials you bring to site.

8.4 You must speak up if you become aware of illegal activity which could affect the environment.

9 Quality

9.1 You are being employed as a specialist contractor in your field. We expect you to deliver your work to meet the quality expectations of Bagnalls and its customers.

9.2 Your employees must be trained in the delivery of your services and hold the required competencies to use any specialist equipment or perform specific job functions.

- 9.3 You must ensure that all materials, plant, and other resources are to the given and specified standard required in the contract.
- 9.4 Any products, materials or services used may be subject to inspection by Bagnalls, the customer or another party. No products, materials or services can be substituted with CFSI (counterfeit, fraudulent or suspect items) as an alternative for genuine products, materials, or services.
- 9.5 All works must be inspected by your personnel to assure quality expectations have been achieved prior to handover to Bagnalls.
- 9.6 All works are subject to third party inspection by the customer, Bagnalls or any other stated third party.
- 9.7 You must rectify any defects identified or carry out remedial work in a timely manner.

10 Data Protection

- 10.1 You are expected to understand your obligations under the General Data Protection Regulation 2018 (GDPR).
- 10.2 You must ensure that any personal data supplied to you by Bagnalls is kept securely and protected from unauthorised access.
- 10.3 You may act on our instructions in the way you process personal data provided by us. You must not use that data for any other purpose.
- 10.4 You may not share personal data with a third party without the express consent of a manager at Bagnalls.
- 10.5 If you are provided with updated information from Bagnalls you must ensure your records are corrected.
- 10.6 You must comply with instructions we give you about deletion of data.
- 10.7 You must ensure that any data breach is reported to us without due delay, and in any event, within 24 hours of it occurring. You should ensure your employees understand their responsibilities in this area.
- 10.8 You must have a process in place to respond fully to a subject access request (SAR) within 30 days.
- 10.9 You must speak up if you become aware that anyone working for or on behalf of Bagnalls is using personal data inappropriately.

11 Communities

- 11.1 The behaviour of all those working on our sites reflects upon the Bagnalls' brand. You must ensure that your employees and sub-contractors behave appropriately at all times, including being respectful and polite to all they come across.

- 11.2 We expect all those working on our sites to keep noise and other disruption to a minimum.
- 11.3 We encourage those we work with to engage with their local communities, for example through volunteering, charity donations and employment of apprentices.
- 11.4 You must speak up if you notice someone acting in a way which would present a poor view of Bagnalls.

12 Marketing and Social Media

- 12.1 You must not post anything about Bagnalls* on social media or marketing materials without the express consent of a Bagnalls' Branch Manager or Director. This includes photographs of the contracts or our employees.
- 12.2 You are expected to have a social media policy which is communicated to your employees. You must make it clear that your employees are not permitted to make posts about Bagnalls* on their own social media accounts, whether such posts are public or private.
- 12.3 Your employees must not use social media to discriminate against, harass or bully Bagnalls' employees, our customers, or anyone present on our sites.
- 12.4 You must speak up if you encounter inappropriate posts about Bagnalls* on social media, whether made by our employees or those working for you.

*Bagnalls or any related sites/contracts where you are working on behalf of our customers.