BAGNALLS
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Supplier and Subcontractor Code of Conduct

This Code sets forth Bagnalls' ethical and business conduct requirements for its suppliers and Subcontractors.

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1 Introduction

1.1 This document outlines the standard of behaviour we expect from our supply chain. It applies to our immediate suppliers and subcontractors, as well as expecting the same standard of behaviour from any business used in the supply chain of our suppliers and subcontractors.

1.2 This is a Group document and relates to Alfred Bagnall and Sons Limited and all its subsidiary companies including the following:

a) Alfred Bagnall & Sons (Support Services) Limited
b) Alfred Bagnall & Sons (East Midlands) Limited
c) Alfred Bagnall & Sons (Leeds) Limited
d) Alfred Bagnall & Sons (London) Limited
e) Alfred Bagnall & Sons (Midlands) Limited
f) Alfred Bagnall & Sons (North East) Limited
g) Alfred Bagnall & Sons (North) Limited
h) Alfred Bagnall & Sons (North-West) Limited
i) Alfred Bagnall & Sons (Restoration) Limited
j) Alfred Bagnall & Sons (South Wales) Limited
k) Alfred Bagnall & Sons (West) Limited

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 subcontractors:

a) ***Safety - is always at the heart of our decision making and will never be compromised.*** Safety is a key 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 that your processes will ensure that we are told of any safety issues on our sites.

a) ***Integrity - We always act with trust, honesty and transparency.*** We do what we say we are going to do. We will be honest with our suppliers and subcontractors. 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.

b) ***Respect – We are an inclusive business and treat everyone fairly, with respect and courtesy.*** We will be fair to our suppliers and subcontractors and pay in line with the agreed payment terms. We expect our suppliers and subcontractors to treat those in their supply chain fairly and not to delay or decrease payment unreasonably. We also require anyone working on behalf of Bagnalls to be respectful of others and not to discriminate against, bully, harass or victimise anyone.

c) ***People – Teamwork is essential to our ongoing success.*** We invest in our people so they feel valued, heard and supported. We expect our suppliers and subcontractors to treat their employees fairly, including paying the Living Wage to anyone working on Bagnalls' sites. We also expect our subcontractors to work with the Bagnalls team to deliver a consistent, reliable service to our customers which sets us apart from our competitors.

3 What to do if you have a Serious Concern

3.1 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.

3.2 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.

3.3 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 confidential whistleblowing email address or phone number which you communicate to your employees.

3.4 You are required to provide your employees with clear guidance on how to promptly report any suspected wrongdoing, ensuring confidentiality of the whistleblower, all parties involved, and the information disclosed. You must guarantee an appropriate and timely response while protecting whistleblowers from any form of retaliation.

3.5 Concerns can be raised confidentially to Bagnalls through designated channels, reinforcing that honest reporting of potential misconduct will not impact the supplier's or subcontractor's relationship with Bagnalls.

4 Fraud, Bribery and Corruption

4.1 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.

4.2 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.

4.3 You must not steal from our Company or from our customers or third parties.

4.4 You must be accurate in your claims to us for services or materials provided, including any time recording.

4.5 You must make sure you comply fully with your tax obligations. We will not facilitate tax evasion.

4.6 You are responsible for undertaking proper assessments of the employment status of any individual deployed on Bagnalls' sites working on your organisation's behalf. You must not engage or deploy any individuals on Bagnalls' sites who fall within off-payroll working rules, commonly referred to as IR35.

4.7 You must not knowingly conceal defects.

4.8 You are responsible for ensuring your employees adhere to ethical standards to prevent fraudulent activities. Prompt reporting of any suspected or actual fraudulent behaviour within the supply chain is mandatory.

4.9 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.

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

4.11 You must disclose any actual or potential conflicts of interest that could influence your impartiality or objectivity in contracts with Bagnalls. Procedures must exist to manage and mitigate conflicts of interest to maintain transparency and trust.

4.12 You must operate with integrity, ensuring that all business dealings are conducted fairly and transparently. Anti-corruption measures must be embedded throughout the supply chain, with mandatory compliance to all relevant anti-bribery laws and regulations. Suppliers should promote awareness and training within their teams to prevent corruption.

4.13 The whistleblowing email: whistle@bagnalls.co.uk can be used if/when required.

5 Entertainment, Hospitality, Gifts, and Cash Rewards

5.1 As a supplier to Bagnalls, no gift that is morally inappropriate or indecent must ever be offered to any Bagnalls Group Employee.

5.2 Gifts should only be provided as tokens of esteem, courtesy, or in return for hospitality, and must always respect local customs and practices.

5.3 Suppliers and subcontractors must not offer, accept, or solicit any gift or gratuity that could reasonably be interpreted by a third party as an attempt to improperly influence a Bagnalls employee in any business decision.

5.4 The following gifts are strictly forbidden to be offered to Bagnalls personnel:

- Gifts or loans of cash, including cash equivalents such as gift cards or gift certificates.
- Any gifts prohibited by local laws.
- Gifts not delivered directly to the intended Bagnalls recipient at their official business address.
- Gifts intended to secure improper advantages such as gaining or retaining business.
- Gifts forbidden by Bagnalls or the recipient's organisation policies.
- Gifts given to family members of Bagnalls employees or other business associates.
- Any items that provide personal benefit to Bagnalls employees regardless of their value.
- Credit, lease, rental or any financial applications made on behalf of Bagnalls employees.

6 Employment Practices and Safeguarding

6.1 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. Subcontractors must pay the Living Wage, as set annually by the Living Wage Foundation, to anyone working on Bagnalls' sites.

6.2 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.

6.3 You must ensure that anyone working for you on a site where children or vulnerable adults are likely to be present is aware of the signs and symptoms of abuse. This includes where there are apprentices or young people under the age of 18 working on site. Where safeguarding issues are observed, you must report them directly to the Safeguarding Lead at the local Bagnalls branch.

7 Human Rights, Labour Conditions and Modern Slavery

7.1 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.

7.2 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.

7.3 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.

7.4 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.

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

8 Right to Work in the UK

8.1 It is mandatory that all workers engaged in providing services for Bagnalls have a valid legal right to work in the United Kingdom. This includes employees, agency personnel, sole contractors, and any personnel supplied by approved lower-tier subcontractors.

8.2 Before any individual is permitted to work on a Bagnalls site, you must verify their legal right to work in the UK and confirm they are authorised to undertake the specific work. This verification must be supported by retention of appropriate documentary evidence.

8.3 As the subcontractor, you are responsible for monitoring and rechecking any time-limited permissions before they expire to ensure ongoing compliance.

8.4 You must undertake and retain evidence of right to work checks on the correct individual before work commences, maintaining these records for inspection. Bagnalls reserves the right to audit these records at any time to verify compliance.

8.5 You should provide full names of those working on Bagnalls sites and ensure that they bring photographic identification to site on their first day which corresponds with the name under which the right to work check was carried out.

8.6 Sole Contractors must comply fully with all right to work legislation and must demonstrate and provide evidence of their own right to work status. This must be provided by the first day of working on site. If no documentation is provided, you will not be allowed to work on site.

8.7 If the subcontractor is not a limited company, Bagnalls must carry out right to work checks on all those who are engaged by the subcontractor by the first day of working on site. You must ensure that all those who will work on Bagnalls sites provide required right to work documents by the first day of working on a Bagnalls site. Should they not have the appropriate documentation, they will not be allowed to work on site.

9 Bullying, Harassment and Discrimination

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

9.2 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.

9.3 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.

9.4 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.

9.5 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.

9.6 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.

9.7 You must take all reasonable steps to prevent third-party harassment (including sexual harassment) from customers, clients, and public visitors. This will include conducting a documented risk assessment, implementing effective measures to address and mitigate third-party harassment. You must be able to demonstrate these reasonable measures to us showing how you actively prevent harassment incidents.

9.8 You must take all reasonable steps to assure that anyone attending a Bagnalls site on your behalf does not harass (including sexually harass) any employees of Bagnalls or other persons present at the site. This will include training and communicating a zero-tolerance approach to harassment.

9.9 If Bagnalls reasonably determines that any person engaged or supplied by the subcontractor has harassed an employee or other person on site, that person must be

removed immediately and not allowed to return without prior written consent from Bagnalls. The subcontractor must comply promptly with this requirement and, if necessary, provide a suitable substitute at no additional cost to Bagnalls.

10 Occupational Health and Safety

10.1 Occupational Health and Safety is a key priority for all at Bagnalls. We expect it to be yours too.

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

10.3 You and your employees must be fit to work. We have a zero-tolerance approach to people working on our site under the influence of alcohol or illegal drugs. Those taking prescription medication must seek medical advice about the impact of their drugs on their ability to work safely on site. You must ensure that Bagnalls are aware of any concerns relating to any individual working for, or on behalf of you, which could impact upon their safety, or the safety of others.

10.4 You must provide us with a Risk Assessment and Method Statement (RAMS) specific to the job prior to starting work, including COSHH (Control of Substances Hazardous to Health) assessments where required. In addition, you must provide competency records for all those working for you.

10.5 All site personnel must attend a Bagnalls site induction before commencing work. You and your employees must follow the instructions given in the contract phase plan (CPP). If anything changes you must stop work. You must also ensure that the key points in your own RAMS and any COSHH assessments are reviewed with all those working on your behalf, before commencing any work on a Bagnalls site.

10.6 Where you use vibrating tools, you must demonstrate that you minimise exposure to vibration and have a system to monitor exposure to vibration.

10.7 You must report any accidents, hazards or near misses, including unsafe conditions to the Contracts Manager running the job.

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

10.9 We ask that you pay attention to your employees' wellbeing and mental health and support people to seek help when needed.

11 Environment

11.1 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.

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

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

11.4 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 subcontractor, you are responsible for disposing of rubbish from materials you bring to site.

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

12 Quality

12.1 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.

12.2 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.

12.3 You must ensure that all materials, plant and other resources are to the given and specified standard required in the contract.

12.4 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.

12.5 All works must be inspected by your personnel to assure quality expectations have been achieved prior to handover to Bagnalls.

12.6 All works are subject to third party inspection by the customer, Bagnalls or any other stated third party.

12.7 You must rectify any defects identified or carry out remedial work in a timely manner.

13 Data Protection

13.1 You are expected to understand your obligations under the General Data Protection Regulation 2018 (GDPR).

13.2 You must ensure that any personal data supplied to you by Bagnalls is kept securely and protected from unauthorised access.

13.3 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.

13.4 You may not share personal data with a third party without the express consent of a manager at Bagnalls.

13.5 If you are provided with updated information from Bagnalls you must ensure your records are corrected.

13.6 You must comply with instructions we give you about deletion of data.

13.7 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.

13.8 You must have a process in place to respond fully to a subject access request (SAR) within 30 days.

13.9 You must speak up if you become aware that anyone working for or on behalf of Bagnalls is using personal data inappropriately.

13.10 You must comply with all relevant data protection laws, including GDPR, ensuring personal data is handled securely and only for authorised purposes. You are responsible for maintaining records, implementing security measures to prevent breaches, cooperating with Bagnalls on data subject requests, and following company data protection policies to ensure ongoing compliance.

13.11 Bagnalls will only hold persona data on your employees to meet legislation requirements and will delete such data when no longer needed.

14 Communities

14.1 The behaviour of all those working on our sites reflects upon the Bagnalls' brand. You must ensure that your employees and subcontractors always behave appropriately, including being respectful and polite to all they come across.

14.2 We expect all those working on our sites to keep noise and other disruption to a minimum.

14.3 We encourage those we work with to engage with their local communities, for example through volunteering, charity donations and employment of apprentices.

14.4 You must speak up if you notice someone acting in a way which would present a poor view of Bagnalls.

15 Marketing and Social Media

15.1 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 contracts or our employees.

15.2 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 personal social media accounts, whether such posts are public or private.

15.3 Your employees must not use social media to discriminate against, harass or bully Bagnalls' employees, our customers, or anyone present on our sites.

15.4 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.*

Acceptance of the Terms of the Subcontractor Code of Conduct

We/I, the undersigned, acknowledge that we/I have received, read, and understood the Bagnalls Code of Conduct.

We/I confirm that:

- We/I understand the standards, principles, and expectations outlined in the Code.
- We/I agree to comply with these requirements in all business dealings with Bagnalls.
- We/I will ensure that our/my employees are aware of, and adhere to, these standards.
- We/I will promptly report any actual or suspected breaches of the Code of Conduct to Bagnalls.
- We/I understand that failure to comply with the Bagnalls Code of Conduct may result in a review of our business relationship and, where necessary, termination of contracts.

Supplier Details

Company Name:	
Company Registration Number:	
Registered Address:	
Contact Name:	
Position:	
Email:	
Phone:	

Bagnalls Authorised Signatory

Name:	
Position:	
Signature:	
Date:	