



BUSINESS ETHICS POLICY

The reputation of Walker Construction (UK) Ltd is built on the trust and confidence of those with whom we deal. The Company aims to maintain high ethical standards in the conduct of its business and will not tolerate any behaviour or practice that compromises its integrity.

Walker Construction is committed to continuously improve our performance.

Compliance

The Company aims to maintain high ethical standards in carrying out its business activities. Practices of any sort that are incompatible with the Company's principles and policies will not be tolerated. Strict adherence to these principles and supporting policies is a condition of employment in the Company.

It is recognised that lessons can be learned from other organisations, as well as from the many examples of good practice within our own company.

Employees are to:

- Behave ethically when doing business for the company, in accordance with the specific objectives set out below.
 - and
- Confirm their compliance with the following objectives and supporting policies and procedures on an annual basis.

Unethical Behaviour and 'Whistle-Blowing'

The Managing Director is responsible for initiating and supervising the investigation of all reports of breaches of these principles and policies and ensuring that appropriate disciplinary action is taken when required.

Walker Construction aims to create the climate and opportunities for employees to voice genuinely held concerns about behaviour or decisions that they perceive to be unethical. Therefore, any employee who needs guidance or advice on business ethics issues is to speak to a Director.

Specific Objectives

This is not a complete list and any action such as fraud, malpractice or which is otherwise unlawful, dishonest and harmful to others or otherwise against Company principles and policies will result in disciplinary action.

1. Clients and their Customers.

We are committed to being honest and straightforward in our dealings with our clients and their customers, and believe that integrity in dealings with clients and their customers is a prerequisite for a successful and sustained business relationship. Personal contact,



BUSINESS POLICY

Reviewed: October 2021

Page 2 of 3

helpful and responsive action are features of the service we provide to develop long-term relationships. Therefore, the Company will:

- Understand, meet and strive to exceed the needs of our clients and their customers.
- Operate within the best practices of the industries in which it competes and in a manner that makes Walker Construction easy to do business with.
- Respect the confidentiality of information that we might obtain and retain in relation to clients and their customers.
- Take all reasonable care to avoid untruths, concealment and overstatement in all advertising and other public communications.

2. Company Shareholders.

The Company is committed to maintaining the highest standards in the best interests of our employees and shareholders.

The Company will:

Protect the interests of shareholders and treat them all fairly.

- Provide timely and truthful financial information in accordance with statutory requirements.
- Communicate its business principles, policies and achievements.

3. Employees.

The Company is committed to high standards of employment practice and wishes to be recognised as a good employer. It will:

- Actively engage with employees through an open communication process.
- Pay a fair wage for a fair day's work, recognising the contributions made by individuals to the Company's success.
- Support employees in their own efforts in community work.
- Not tolerate any sexual, physical or mental harassment of its employees.

In addition, all employees will:

- Not use any information that they receive in the course of their business dealings for personal gain or any purpose except that for which it is given.
- Not to receive gifts and they may not give money or any gift of significant value to a client, nor may they accept any gift or service that could be construed as being intended as a bribe.
- Be alert to and report any fraudulent activities and maintain accurate company records to help prevent their occurrence.

4. Suppliers, Advisors and Agents.

The Company will aim to develop relationships with its suppliers, advisors and agents based on mutual trust and shared values. Therefore:



BUSINESS POLICY

Reviewed: October 2021

Page 3 of 3

- All employees will conduct business with suppliers, advisors and agents in a professional manner.
- The Company will endeavour to pay its suppliers, advisors and agents on time and according to agreed terms.

5. Competitors.

The Company will:

- Compete in a lawful manner.
- Not seek to damage the reputation of competitors, either directly or by implication.
- Avoid discussing proprietary or confidential information in any contacts with competitors.
- Not attempt to acquire information regarding a competitor's business by unlawful means, including industrial espionage, hiring competitors' employees to obtain confidential information, urging competitors' employees and clients to disclose confidential information, or any other approach that is not above board.

6. Government, Legislators and Regulators.

The Company will:

- Seek to comply with all legislation affecting its operations.
- Not make any financial contribution to political parties.
- Not knowingly evade tax obligations.

7. Community and Non-Government Organisations.

The Company will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. Therefore, the Company will:

- Make charitable donations, and educational and cultural contributions.

Signed:

**Signature
Protected**

.....
Phil Webb
Managing Director

Dated: 4th October 2021

This policy has also been produced as a separate document and is on the Company Website at www.walker-construction.co.uk