

CODE OF CONDUCT POLICY

GDG_008_v3



GILPIN
DEMOLITION GROUP

AUTHORISED BY MR D Rudall – H&S Director

Version	Revised By	Job Title	Reason for Change	Date
001	Paul Nicholls	Commercial Director	First Version	28/10/16
002	Georgina Gilpin	Finance Director	Template Update	20/06/18
003	Duncan Rudall	H&S Director	Management change and update	12/06/19

Definition of Gilpin Demolition Group Ltd

- Sam Gilpin Demolition Ltd
- Gilpin Environmental Ltd
- Gilpin Scrap Metals Ltd
- Gilpin HR Ltd
- Gilpin Marine & Plant Hire Ltd

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1.0 Introduction

1.1 The Gilpin Demolition Group Ltd (GDG) conducts its business in strict compliance with applicable laws, rules and regulations as well as the highest moral, ethical and professional standards. Consistent with these standards, GDG and each of its affiliated companies has adopted the following commitments to:

1.1.1 Emphasise honesty, fairness, confidentiality and a sense of responsibility to our subcontractors and suppliers that will enable us to be a good contractor and understand and meet the expectations of our clients as well as the consultants, engineers and other professionals with whom we work.

1.1.2 Treat employees fairly, implementing employment practices and programs related to compensation, education, training, recreation, and health based on equal opportunity for all employees.

1.1.3 Provide safe and healthy working conditions and maintain formal programs intended to prevent work-related injuries and accidents.

1.1.4 Protect each other's privacy and conduct ourselves with the dignity and respect due all human beings.

1.1.5 Demonstrate a commitment to adding social value in the many communities in which we work and to society as a whole.

1.1.6 The purpose of the GDG Code of Conduct Policy is to supplement GDG's Policy Manual and provide general guidance on some common ethical and legal issues you may encounter relating to GDG's business interests either on or off the job.

1.2 If you encounter circumstances that call for an interpretation or examination of GDG's policy or any of the issues discussed in this document, consult your supervisor, Human Resources, or the Commercial Department. Guidance for reporting suspected illegal or unethical conduct and an explanation of the consequences of this conduct is provided in the last section of this Code of Conduct Policy.

2.0 Confidentiality Standards (GDPR)

2.1 The protection of confidential information and trade secrets is vital to the interest and the success of GDG. Information about GDG, its employees, clients, suppliers, and Sub-Contractors is to be kept confidential and divulged only to individuals within the Company with both a need to receive and authorisation to receive the information. If in doubt as to whether information should be divulged, or in favour of not divulging information, discuss the situation with your supervisor. All paper and electronic records and files maintained by GDG are confidential and remain the property of the Company. Records and files are not to be disclosed to any outside party without the express permission of your immediate supervisor.

Confidential information includes, but is in no way limited to the following:

- Financial records and information.

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- Procurement and operating procedures.
- Client preferences.
- New service announcements.
- Technology, inventions, and processes.
- Business, marketing, and strategic plans and projections.
- Personnel, payroll records and compensation data regarding current and former employees.
- The identity of, contact information for, and any other information on current, past or prospective. clients, their procurement personnel, procurement policies, requirements and preferences.
- Any other documents or information regarding the Company's operations, procedures, or practices.

2.2 Except in performing your work at GDG, confidential information may not be removed from GDG's premises without express authorisation. Confidential information obtained during or through employment with the Company may not be used by any employee for furthering current or future outside employment or activities for obtaining personal gain or profit. Upon termination of employment at GDG for any reason, an employee must promptly return to his or her department head or supervisor all Company documents and materials in the employee's possession, which contain any confidential information. GDG reserves the right to avail itself of all legal and equitable remedies to prevent impermissible use of confidential information or to recover damages incurred as a result of the impermissible use of confidential information. Employees may be required to enter into written confidentiality agreements confirming their understanding of GDG's Confidentiality Policies.

3.0 Conflicts of Interest

3.1 Fulfilment of GDG's commitments requires that the interests of the Company and its clients come first. Potential conflicts of interest may create doubt on the part of clients, subcontractors, suppliers or employees and, accordingly, must be avoided.

Examples of actual or potential conflicts of interest include the following:

- Ownership of, or any other interest in, a firm that has done or desires to do business with GDG.
- Acceptance of payments or services from those seeking to do business with GDG.
- Placement of business with a firm that will result in a direct economic benefit to an employee or any member of his or her family.

3.2 The appearance of a conflict of interest must also be avoided. Any employee who feels that he or she may have an actual or potential conflict of interest should report all pertinent details to Human Resources or the Commercial Department.

4.0 Antitrust Policy

4.1 It is GDG's policy that all employees, members, managers and directors must comply with all antitrust/competition legislation. As part of this policy, communication, directly or indirectly, by employees, members, managers, and directors with any competitor regarding the present or

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contemplated business activities of GDG or any of its competitors is strictly prohibited. It is absolutely forbidden for anyone to discuss bidding or pricing decisions, business plans, procedures or policies with a GDG competitor or subcontractor.

5.0 Political Contributions

5.1 GDG encourages its employees to become involved in public affairs and to participate in political activities. Employees must recognise, however, that their involvement and participation must be on an individual basis, on their own time, and at their own expense. GDG does not make political contributions. Further, when an employee speaks on public issues, it must be made clear that comments or statements made are those of the individual and not of GDG.

6.0 Protection of Company Assets and Information

6.1 Employees are required to protect GDG's assets. These assets include, but are not limited to, all information, passwords to access automated information/computer systems, computer hardware, computer software, reports, records, analysis, plans, drawings, machines, project equipment and official papers. GDG retains the exclusive right of ownership of all company assets in any form or state and designates management representatives as the guardians of those assets in order to ensure information reliability, accuracy, integrity, and confidentiality, as appropriate. GDG designates individual directors as custodians responsible for company information control and protection. Any use of GDG's assets for any reason other than company related business is prohibited.

7.0 Receipt or Giving of Items By Employees

7.1 Employees may accept token gifts, meals, refreshments, or entertainment in connection with business discussions where the acceptance of such is not illegal, is of nominal value, and is clearly appropriate under the circumstances. While it is difficult to define the term "nominal" by means of a specific pound limitation, a common-sense determination should dictate what one would consider lavish, extravagant, or frequent. No employee may participate in major entertainment functions (e.g., golf or football trips) unless the employee or GDG either pays the full cost. Employees should review the details of major functions with their line manager prior to participation, including discussion of reciprocal activities.

7.2 It is the personal responsibility of every employee to ensure that his or her acceptance of such token gifts, meals, refreshments, or entertainment is proper and could not reasonably be construed as an attempt by the offering party to secure favourable treatment. If the gift could be construed as an attempt to secure favourable treatment, the employee must decline the gift and notify their line manager, Human Resources or the Commercial Department.

8.0 Share Ownership

8.1 In order to avoid a conflict of interest, GDG employees should not purchase or retain ownership of shares in any privately-owned firm that is a subcontractor or supplier or has another contractual or business relationship with GDG unless the employee has disclosed such interest to the Company, and the Company has agreed the ownership interest poses no conflict of interest. Employees are required to disclose to the Commercial Department or Financial Director any financial interest in companies they are negotiating or working with in the course of their employment.

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9.0 Copyright/Patent Agreement

9.1 While employed by the Company, employees assign to GDG all rights and interests in copyrights and/or patents concerning work performed during the course of employment with GDG, or in any way connected with or relating to duties performed on behalf of GDG. In addition, at GDG's request, employees must secure a patent and/or copyright at GDG's expense and assign all rights and interests in the copyright and/or patent to GDG.

10.0 Copyright Compliance

10.1 It is GDG's policy that all employees respect the rights of intellectual property owners by complying with United Kingdom copyright law. Accordingly, do not alter or remove any copyright information about (i) the title or other information identifying the work; (ii) the name or other information about the author/owner of the work; (iii)

terms and conditions of use of the work; or (iv) a copyright notice. When using the Internet, copyright law applies. Therefore, employees should not copy or distribute copyrighted material (e.g., books, magazines, manuals, articles, software, database files, documentation, articles, graphics files, and downloaded information) through

the e-mail system, photocopy machines or by any other means unless the employee has confirmed in advance from appropriate sources that GDG has the right to copy or distribute the material. While limited copying is permitted in certain instances, when among other things, the copying does not diminish the potential market for or value of the copyrighted work, these rules can be complex. Failure to observe a copyright may result in disciplinary action by GDG as well as legal action by the copyright owner.

11.0 Public Sector Procurement

11.1 The following policy is designed to implement the European Union (EU) Procurement Regulations and the applicable Procurement Rules. The regulations prohibit various activities during the procurement process and are designed to eliminate the release of "insider" or confidential information during the procurement process. The penalties for failure to comply with the regulations are severe, and include stiff public exclusion penalties, termination of the contract, refund of profits and criminal investigations. Accordingly, this policy should be read with care and strictly followed.

11.2 Timing and Applicability: This policy applies to ALL EU procurements in which GDG is a competitor, regardless of whether GDG is competing as a principle contractor, as a member of a joint venture or as a subcontractor. It also applies to the modification and extension of existing public sector contracts and subcontracts.

11.3 Prohibited Conduct: GDG employees may not, directly or indirectly:

- Make an offer or promise of future employment or business opportunity, or engage in discussions concerning future employment or business opportunities, with a procurement official.
- Offer, give or promise to a procurement official any money, gratuity or other thing of value.
- Solicit or obtain, prior to contract award, any proprietary or source selection information from any officer or employee of the subject agency.

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- Disclose proprietary or source selection information to any person other than an individual authorised by the contracting officer to receive such information.

12.0 Personal Standards

12.1 General Appearance: Employees must maintain a high level of personal hygiene presenting a clean, neat, tidy, smart, safe and practical appearance at work. Employees attending training, conferences or external events should dress in a manner appropriate to the type of event, and in such a way as projects a positive image of the organisation.

12.2 Clothing and Footwear: Clothing and footwear should not be of a nature that would be revealing or offensive to colleagues or visitors and be suitable for the location they're attending. All footwear for site locations requires approval before purchase by a senior manager.

12.3 Jewellery, Body Art and Body Piercing: Jewellery worn must be consistent with health and safety and professional standards and must not obstruct or prevent an employee carrying out their duties.

Tattoos, body art and body piercings should be covered appropriate to the situation. If employees have body art or piercings for religious or cultural reasons which cannot be covered, this must be discussed with appropriate line manager.

12.4 ID Cards: Named ID cards should be clean and worn always when employees are acting in an official GDG's capacity. If an employee loses their ID card, they must report this to their manager as soon as possible and arrange for a replacement. It is every employee's responsibility to have an accurate, up to date ID Card.

12.5 Smoking: All employees must refrain from smoking during client meetings. Should any employee need to smoke, it should be conducted in the appropriate designated areas.

12.6 Specific Requirements: Most specific requirements arising from religious, ethnicity and cultural needs can be accommodated by this policy, providing health, safety and security standards are not compromised and line manager agreement is given.

12.7 Dress code, appearance and personal presentation offences will be dealt with under the GDG's Disciplinary Policy and Procedure.

13.0 Customer Care and Complaints

13.1 The Directors of GDG are committed to implementing, monitoring and continuously improving the high level of service it provides to its customers, their professional representatives and other supply chain partners.

In conjunction with BS EN ISO 9001 certification, which controls compliance with the company's documented quality procedures, this policy extends our commitment by including the considered views and comments of our Clients, Stakeholders, Professionals, Supply Chain, and GDG's own staff. It is intended that this statement will emphasise the standards of quality and service the company is intent upon providing and offer the reassurance that any item which does not achieve the required standard will be promptly addressed and adequately resolved.

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13.2 We encourage and welcome open and constructive dialogue at every stage of the tender, delivery and management process between all members of the 'Project Team' and Stakeholders who are impacted by our activities. Our experience has proven without doubt that this ensures the best route to a successful project. Issues raised will be fairly considered and any improvements identified will be implemented.

13.3 Complaints: To continuously improve our high level of service to our customers we expect complaints and defect issues to be dealt with promptly to the satisfaction of the customer. We have a documented complaints procedure with all complaints/defects being categorised as follows:

- Category 1 Emergency immediate action;
- Category 2 Urgent resolved within 48 hours; and
- Category 3 Normal resolved within 7 to 14 days.

13.4 Failure to respond and/or notify us of rectification work by our Supply Chain will result in a warning notice being issued. A further warning notice will result in future work with Cornerstone not being considered.

13.5 The Company has appointed a Director within the organisation who will be the single point of contact and will be responsible for ensuring that any defects or complaints are promptly dealt with to the satisfaction of the customer. The Commercial Director is responsible to the Managing Director and reports to all parties on a regular basis and most importantly, liaises with Clients and Stakeholders promptly on actions implemented.

13.6 Close liaison will be maintained between a GDG Director or a Senior Manager and the Client throughout the Project process and Clients will be invited, upon completion, to complete a confidential non-contractual questionnaire upon which they can submit their views on key issues, including Quality, Performance, Relationships, Health & Safety, Consideration, Level of information provided at Pre-Project stages and Customer Care.

A handwritten signature in black ink, appearing to be 'Duncan Rudall', written over a horizontal line.

Duncan Rudall
Health and Safety Director
Gilpin Demolition Group Ltd