

This policy statement forms part of our Integrated Management System (IMS) which is certified to BS EN ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, National Highways Sector Scheme (NHSS) 16 Certification and CE Marking to EN13108.

This policy outlines MGL Group's expectations regarding Company and employee behaviour towards colleagues, the wider Company and associated stakeholders.

**Responsibilities:** The responsibility for determining Company Policies is derived by the Board of Directors. Deborah Milnthorp, HR Director has been appointed as having overall responsibility for this Policy. Each employee will recognise personal responsibility for observing the Company's Policies, Instructions and Procedures.

**Scope:** This policy applies to all employees regardless of employment agreement or position.

**Company Records:** The Company and its employees will maintain accurate and complete records and accounts of all of transactions and ensure that these honestly and fairly reflect our dealings. We will not alter, destroy, conceal or falsify documents, accounts or records.

**Competition Law Compliance:** The Company will trade fairly, openly and honestly in all of our markets, and will not act in a way which prevents, restricts or distorts competition, or seek an unfair competitive advantage.

**Fair Payment:** The Company will act with honesty and integrity and deal fairly with supply chain partners, competitors, clients, and the wider community. We will seek to ensure certainty of payment and the prompt payment of our supply chain.

**Charitable Donations:** The Company will actively support and sponsor appropriate charities and other non-profit organisations

**Compliance Obligations:** All employees must protect the Company's legality and comply with all laws, regulations and compliance obligations applicable to the works

**Confidential Information:** Employees must keep confidential information safe and protect it from unauthorised disclosure.

**Data Protection:** Employees must respect an individual's right to privacy and treat all personal data as confidential. The Company will always comply with data protection and privacy laws.

**Respect in the Workplace:** The Company will not tolerate any kind of harassment, bullying or discrimination by anyone or against anyone who works for us or with us.

We expect all employees to treat others with fairness and respect. Employees must conform to the Equality and Diversity Policy.

**Professionalism:** All employees must show integrity and professionalism in the workplace.

**Personal Appearance:** All employees must follow the Company dress code and maintain a professional image at all times.

**Bribery and Corruption:** Employees must not accept, request or offer any financial or other reward from any person in return for providing some favour. Employees must conform at all times to the Anti-Bribery and Corruption Policy.

**Conflict of Interest:** Employees must avoid any personal, financial or other interests that might impact their ability or willingness to perform their duties to the best of their abilities.

**Alcohol and Drugs:** Employees must not report for work at any of our offices, sites or premises whilst under the influence of alcohol or drugs. Employees must conform at all times to the Alcohol and Drugs Policy.

**Modern Slavery:** Employees are encouraged to watch for potential signs of slavery and exploitation and report any concerns as soon as possible to the Company.

**Company I.T. Equipment:** Company computer systems (including desktops, laptops, tablets, landlines, smart and mobile telephones) must be used for the purpose for which they were intended, employees must not use them in any way which could affect their operation or integrity, or which could bring the Company into disrepute.

**Safety, Health, Environment and Quality (SHEQ):** Employees must not compromise the health and safety of anyone involved in or affected by their activities.

Employees must follow all compliance obligations for the protection of the environment and seek to make a positive contribution where practicable.

Employees must work to any quality plans in place and rectify any defective works when they occur

**External Communications:** Employees must not communicate or disclose information about the Company without the express permission of the Directors.

**Attendance and Timekeeping:** Employees must comply with any time recording procedures relating to the offices, sites or premises as applicable.

**Disciplinary Actions:** The Company will take disciplinary action against employees who repeatedly or intentionally fails to follow our code of conduct and associated policies and procedures.

**Communication of Policy:** We will at all times ensure that all employees, temporary staff, and subcontractors are made aware of this policy, together with the relevant section of the Health and Safety legislation and the implications therein.

**Policy Review:** This policy statement will be reviewed on an annual basis and amended where appropriate.

Deborah Milnthorp  
HR Director  
**January 2021**

