



Business Ethics Policy Statement

It is E&B Group Ltd's goal to maintain the highest standards of ethics, professionalism and business conduct as well as ensure that we act in strict compliance with the law at all times.

We will not tolerate any behaviour or practice that compromises the Company's integrity or honesty. All decisions will be fair and based on transparent processes.

Compliance

Since the Group aims to maintain high ethical standards in carrying out its business activities, practices of any sort that are incompatible with E&B Group Ltd's principles and policies will not be tolerated.

Strict adherence to these principles and supporting policies is a condition of employment. The Group Director's have overall responsibility for ensuring compliance with the objectives of this policy.

Independence and Objectivity

E&B Group Ltd is committed to being fair, transparent and impartial in all of its dealings and our members of staff are expected specific standards of behaviour, namely:

All staff are required to act in a way that is unbiased, and they must not be subject to any influence which may lead them to act in a way which favours any particular person or organisation.

Other than the salary paid by E&B Group Ltd, employees may not directly or indirectly accept any form of payment or material benefit from third parties for services they perform on behalf of E&B Group Ltd.

All staff are required to declare in writing any financial or personal interest, direct or indirect, in another company which is either a supplier to or a competitor of E&B Group Ltd.

Unethical Behaviour and 'Whistle-Blowing'

The Group promotes a working environment which encourages all members of our team to express their concerns about behaviour or decisions that they perceive to be unethical without fear of reprisal or victimisation.

Any member of staff who needs guidance or advice on business ethics issues should speak to the Group Directors.

The Group Directors are 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.

Employment Policies

E&B Group Ltd is committed to attaining the highest standards of employment practice and wishes to be recognised as a good employer. It is committed to communicating its strategy and objectives to employees and to keeping employees informed on the Company's progress against the strategy and objectives.

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We support and promote the ethos and principles of equal opportunities in employment, striving to create a culture where every member of our team is treated fairly and without fear of harassment or victimization for any reason.

Balancing Transparency with Confidentiality

E&B Group Ltd will be transparent in all of its operations except where it is constrained by issues of confidentiality.

The Group will strive to communicate clearly and succinctly in order to minimise complexity in our business dealings.

We will comply with the provisions of the Data Protection Act and members of staff are trained accordingly.

Protecting Business Assets

All representatives of E&B Group Ltd are required to avoid waste and extravagance and are encouraged to identify improvements to systems and procedures to achieve optimal effectiveness, efficiency and responsiveness.

All employees are expected to follow agreed procurement procedures when commissioning third party services. They are also bound by the Group's Business Expenses Policy when incurring business expenses which will be paid or reimbursed by E&B Group Ltd.

The Group's assets and funds may only be used for the legitimate business purposes of E&B Group Ltd.

Suppliers, Advisors and Agents

E&B Group Ltd will aim to develop relationships with its suppliers, advisors and agents based on mutual trust and shared values. Therefore:

All members of staff will conduct business with suppliers, advisors and agents in a professional manner.

The Group will pay its suppliers, advisers and agents on time and according to agreed terms.

As far as is practicable, we will engage with our business partners on matters relating to Corporate Responsibility.

Competitors

E&B Group Ltd will:

Compete in a lawful manner and not seek to damage the reputation of competitors, either directly or by implication or innuendo.

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, clients or occupiers to disclose confidential information, or any other approach that is not above board.

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Governance and Financial Matters

E&B Group Ltd will:

Comply with all laws, rules and government regulations that are applicable to the Company.

Maintain accurate business records, following best practice in all respects.

Maintain financial statements and accounts in a manner that are accurate and auditable.

Contractual Arrangements

E&B Group Ltd is committed to meeting its contractual commitments and will build relationships with its suppliers, agents and contracted service providers based on mutual trust.

All members of staff are expected to understand and comply with the terms of the contracts for which they have a responsibility and appropriate training will be given as necessary.

E&B Group Ltd's Ethical Policy Embraces the Following Commitments:

- Actively encouraging repeat business with key suppliers to nurture quality, trust and good relationships.
- Delivering projects of the highest quality which offer value for clients and end users.
- Establishing favourable payment terms with all suppliers and guarantee payment to agreed terms.
- Encouraging open dialogue among suppliers and employees, supported by knowledge sharing and ongoing communication.
- Promoting an inclusive and pleasant working environment and ensure that no applicant or employee receives less favourable treatment on the grounds of gender, marital status, race, colour, ethnic or national origin, religion, sexuality, disability and without arbitrary restrictions in respect of age.
- Encouraging skills development at all levels and to meet all needs, including the funding of apprenticeships.
- Work towards an Incident Free Environment by striving for the best health and safety standards supported by a comprehensive reporting system.
- Promoting and encouraging mutual respect for people involved in its operational activities and in the environments we work.
- Encouraging employment of local resource and sub-contractors.
- Maximising local supply chains to ensure we can build up a trustworthy, reliable team within reasonable geographical proximity to a project.
- Minimising pollution, reducing waste and CO² emission and aiming to recycle as much waste that comes off the construction sites as possible.
- Working with clients, designers and specifiers to encourage best practice and innovation to assist in delivering a more sustainable built environment.

Signed: *Peter A. Gaskill*
PETER A. GASKILL
DIRECTOR

Date: **31st October 2017.**