

## **CODE OF BUSINESS CONDUCT**

---

### **Policy Statement**

The Breedon Group of companies (“Breedon Group”) are committed to high standards of ethical conduct in all our business dealings in all jurisdictions in which we operate.

It is essential that whenever we interact with our key stakeholders - colleagues, customers, business partners and suppliers, regulators, communities, society and/or the environment around us - we do so professionally and with integrity.

This Code applies to all Breedon Group businesses and to all employees in all our business jurisdictions. It reinforces our values and provides guidance so that our employees and business associates are fully aware of what is expected of them.

In support of our Code, Breedon Group has developed a compliance framework with policies covering competition law, data protection, anti-bribery and corruption and the prevention of facilitation of tax evasion. Breedon has also developed a suite of guidance notes to support the framework on these and other related topics.

The Board is responsible for ensuring these policies and business principles are communicated to, and understood and observed by, all employees and associates. Day to day responsibility for promoting and implementing these policies and business principles is delegated to the senior management of Breedon Group.

### **Standards of Conduct**

We aim to conduct our operations on sound business principles with trust, honesty and integrity and with respect for the human rights and interests of our employees and all other stakeholders. We respect the legitimate interests of all those with whom we have business relationships.

### **Compliance with the Law**

Breedon Group and all our employees and business partners must comply with all applicable laws and regulations, and conduct our operations in accordance with accepted principles of good corporate governance.

### **Employees**

Breedon Group is committed to diversity in a working environment where there is mutual trust and respect and where everyone is accountable for their actions and feels responsible for the performance and reputation of Breedon.

We aim to recruit, employ and promote employees on the sole basis of their ability to fulfill the requirements of the job. We are committed to developing and enhancing each employee’s skills and capabilities.

## **Health & Safety**

We will provide our employees with safe and healthy working conditions and practices. We monitor and report our health and safety performance and shall not compromise the health or safety of any individual. All employees must comply with all our health and safety policies and procedures specific to their duties. We have five core safety commitments which are regularly reinforced and with which all employees are expected to comply.

## **Customers**

Breedon aims to provide quality, high value goods and services which meet all applicable safety standards. We value the trust our customers place in us and will safeguard the information provided to us in accordance with relevant laws and contractual commitments.

## **Money Laundering**

Whilst Breedon Group does not undertake regulated activities for the purposes of anti-money laundering, we adopt best practices and implement controls to ensure, so far as possible, money laundering is not taking place within our organisation.

## **Suppliers and Business Partners**

Breedon Group expects its suppliers and business partners to uphold the same standards as our employees. In our business dealings we expect our partners to respect our business principles and comply with our [Supplier Code of Conduct](#).

## **Communications**

Breedon Group will communicate openly with all stakeholders within the bounds of commercial confidentiality and regulatory constraints. We will ensure that all announcements are accurate, fair, timely and understandable, taking into account applicable standards and regulations. Employees must comply with our Social Media and Networking Policy in relation to their use of social media.

## **Business Integrity**

All Breedon Group business must be conducted in an open, honest and ethical manner as required by our Anti-Bribery and Corruption Policy. Breedon does not permit the offering, giving or receiving of anything which may be construed as a bribe by any person involved with Breedon business or any customer, supplier or business partners of Breedon. Bribes are against the law, no matter what “local custom” may be.

Any gifts or entertainments offered, given or received must be incapable of appearing to interfere with the impartial discharge of duties, and must be authorised and recorded in accordance with the appropriate Breedon rules for such matters.

## **Competition Law Compliance**

All Breedon Group employees are responsible for acquiring an understanding of applicable competition laws in the country in which they operate and must refrain from engaging in practices that breach such laws so we compete fairly. Our Competition Law Compliance Handbook sets out guidance to all employees on competition law and how it applies to our day to day activities. We operate a competition and compliance programme in which all relevant employees participate, which includes biannual confirmation of compliance.

## **Data Privacy**

Breedon Group is committed to protecting the privacy and security of personal details for all employees, customers and suppliers. Our [Data Protection Privacy Policies](#) are designed to assist in ensuring we manage the data protection risks arising out of our activities.

## **Joint Ventures**

On occasion Breedon Group may collaborate with another business and in creating such a collaboration, the Breedon Guidance Note on Joint Ventures must be complied with both before entering into any joint venture arrangement and during the course of a joint venture partnership.

## **Failure to Prevent Tax Evasion**

All employees must ensure they do not engage in or facilitate tax evasion in their dealings with Breedon Group and must comply with our Prevention of Facilitation of Tax Evasion Policy.

## **Modern Slavery**

Breedon Group is opposed to slavery and human trafficking wherever it might occur and expects all employees to be aware of any signs of modern slavery in its business dealings. Our [Modern Slavery and Human Trafficking Statement](#) is published on both our website and the Hub and updated annually.

## **Conflicts of Interests**

All Breedon Group employees must avoid personal activities and financial interests that could conflict, or be perceived to conflict, with their responsibilities to Breedon. They must not engage in any business similar to or competing with any business undertaken by any Breedon Group company. Breedon employees must not seek gain for themselves or others through misuse of their positions. Any circumstances that could give rise to a potential conflict of interest must be disclosed in full to Breedon.

## **Community Involvement**

Breedon Group acknowledges the interdependency between the success of our business and the well-being of the communities in which we operate. We are committed to making a positive social contribution within those communities and acknowledge our responsibility to engage with the communities in which we work. Further details can be found in our [Sustainability statement](#).

## **Environment**

We are committed to making continuous improvements in the management of our environmental impact to promote sustainability and environmental care and awareness.

## **Whistleblowing**

All employees are encouraged to raise promptly any actual or suspected breach of Breedon Group's policies and any other matter of concern. Further details are contained in our Whistleblowing Policy.

## **Breach of this Code**

Compliance with these business principles is essential to our business success. Any breach of this Code of Business Conduct may be considered to be a disciplinary matter and could result in disciplinary action up to and including dismissal. It is therefore imperative that you read and understand this policy.

**If you have any questions or concerns regarding this Code or its content, please contact a member of the Compliance Team whose details are as follows:**

### **Compliance Officer:**

Ross McDonald  
Group Services Director  
Email: [Ross.McDonald@breedongroup.com](mailto:Ross.McDonald@breedongroup.com)  
Mobile: 07717 336401

### **Deputy Compliance Officer:**

Lorna Coxon  
Company Solicitor  
Email: [lorna.coxon@breedongroup.com](mailto:lorna.coxon@breedongroup.com)  
Mobile: 07802 873723