



**THE BREEDON GROUP
SUPPLIER CODE OF CONDUCT**
WORKING TOGETHER TO DO WHAT IS RIGHT



What is the code?

- Our code of conduct (“the Code”) outlines the principles by which we seek to operate our business
- The Breedon Group is committed to operating its business in compliance with applicable laws and regulations and to developing appropriate chains of responsibility within our sphere of influence
- The Code sets out the minimum standards we expect of ourselves and those who work with us. The Code cannot cover every scenario and we expect everyone to use common sense and good judgement in its application
- We have made a commitment to work only with those whose standards are consistent with ours

Who does it apply to?

The Code applies to:

- **Breedon:** We have our own internal policies which set and drive the standards of behaviour within our organisation with which our colleagues are expected to comply
- **Our suppliers:** Suppliers are the collective name we give to our suppliers, subcontractors, business partners, service providers, professional services providers, consultants, intermediaries and agents, all of whom we expect to comply with the Code
- **Our suppliers' supply chain:** You must ensure that the practices and principles outlined in the Code flow down throughout your supply chain, irrespective of conflicting local business practices or customs

What we expect from you

As a supplier to Breedon, you and your suppliers shall:

COMPLIANCE WITH LAWS

- Be aware of all relevant laws policies rules and regulations relevant to your business activity in the jurisdiction you operate in, both those in existence now or introduced or amended in the future (**Relevant Laws**)
- Comply with all Relevant Laws
- Communicate the existence of and need to comply with all Relevant Laws with your supply chain and workforce



What we expect from you

As a supplier to Breedon, you and your suppliers shall:

ETHICAL STANDARDS

- Maintain high standards of integrity, professionalism, honesty and fair dealing
- Not commit any act which may impact on our reputation
- Conduct your business in an open and ethical manner, with respect for human dignity and rights
- Always maintain high standards of social responsibility
- Avoid conflicts of interest and not try to gain improper advantage of preferential treatment for other relationships you may have with us

OPEN AND FAIR COMPETITION

- Practice fair competition, openly and honestly
- Not engage in any agreement, arrangement, concerted practice, information exchange or behaviour in breach of any UK, Irish, EU or other applicable competition laws in force from time to time
- Not participate in bid rigging or other mechanism which limits fair competition in any tender process
- Not participate in any other form of cartel practices with competitors, such as price fixing, carving up territories or allocating customers

What we expect from you

As a supplier to Breedon, you and your suppliers shall, wherever possible:

HEALTH, SAFETY, & WELLBEING

- Recognise and comply with Breedon's [Health, Safety & Wellbeing Policy Statement](#)
- Strive to achieve zero harm due to work activities
- Work with us to achieve a healthy and safe working environment for everyone
- Ensure your workers and your supply chain are adequately trained and provided with the proper equipment to perform their duties
- Recognise that all workers have a right and an obligation to stop unsafe work
- Report and learn from all incidents at our sites

ENVIRONMENT

- Recognise and comply with Breedon's [Environment Policy Statement](#)
- Work with us to achieve our commitment to operating our business:
 - in a sustainable manner
 - protecting the environment
 - preventing pollution
 - mitigating our environmental impacts on surrounding communities
 - improve sustainable development
- Ensure your supply chain comply with the applicable ISO 14001, ISO 50001 and BES 6001 certifications

What we expect from you



As a supplier to Breedon, you and your suppliers shall, wherever possible:

QUALITY

- Recognise and comply with Breedon's [Quality Policy Statement](#)
- Work with us to achieve our commitment to providing our customers with quality products and services
- Strive to continually improve and share good practice
- Comply with compliance obligations, including relevant industry, legal and regulatory codes of practice including ISO 9001 and relevant National Highway Sector Schemes

FALSE CLAIMS AND TAX OFFENCES

- Not claim for something which you are not entitled to
- Not knowingly or recklessly misrepresent the amount of time spent or materials used
- Not conceal defects, falsify records or fabricate evidence in relation to a claim
- Account for and pay all taxation when due to the relevant authorities
- Do not either knowingly or unknowingly engage in the facilitation of tax evasion and take reasonable steps to prevent the facilitation of tax evasion

What we expect from you



As a supplier to Breedon, you and your suppliers shall, wherever possible:

BRIBERY AND CORRUPTION

- Conduct your business with integrity
- Never give, offer or receive bribes either directly or indirectly or accept improper payments
- Never make facilitation payments even if permitted under local law
- Ensure all reports, records and invoices are complete, accurate and not misleading
- Respect our position and policy on gifts and hospitality
- Comply with the UK's Bribery Act 2010 or the Republic of Ireland's Criminal Justice (Corruption Offences) Act 2018 depending on the jurisdiction in which you operate

BULLYING, HARASSMENT AND DISCRIMINATION

- Recognise and comply with Breedon's [Diversity and Inclusion Policy Statement](#)
- Provide equal treatment and opportunities for all workers
- Not tolerate bullying, discrimination, harassment or unwanted sexual behaviour
- Not coerce, intimidate or discriminate against anyone
- Create an inclusive working environment for all

What we expect from you

As a supplier to Breedon, you and your suppliers shall:

MODERN SLAVERY

- Not use child labour or any form of forced, bonded or involuntary labour
- Comply with the provisions of the UK's Modern Slavery Act 2016 irrespective of the jurisdiction in which you operate in ensuring there is no modern slavery within your supply chain and work with us to ensure we maintain compliance
- Have a zero tolerance approach for human trafficking
- Not allow any practice which would restrict free movement of employees
- Ensure all working conditions, hours, wages and benefits comply with Relevant Laws

PROTECTION OF PERSONAL DATA

- Only use all personal data in accordance with applicable laws and regulations
- Not use any of our personal data for reasons not permitted by us
- Not share or disclose any of our personal data without our consent
- Ensure all appropriate safeguards are in place to protect our personal data from unauthorised access
- Comply with the provisions of the General Data Protection Regulation

What we expect from you



As a supplier to Breedon, you and your suppliers shall, wherever possible:

BIODIVERSITY

- Recognise and comply with Breedon's [Biodiversity Policy Statement](#)
- Seek to produce and enhance biodiversity at all sites
- Ensure the value and nature of biodiversity is taken into account in decision making
- Develop and manage biodiversity management plans
- Protect ecosystems, biodiversity and habitats to maximise your contribution to nature conservation

CIRCULAR ECONOMY

- Recognise and comply with Breedon's [Circular Economy Policy Statement](#)
- Ensure waste is not deposited in a manner which may cause harm
- Optimise prudent water usage
- Maximise waste prevention via re-using, recycling, co-processing and energy recovery
- Maximise use of sustainable, responsibly sourced or alternative materials

What we expect from you



As a supplier to Breedon, you and your suppliers shall, wherever possible:

ENERGY AND CARBON

- Recognise and comply with Breedon's [Energy and Carbon Policy Statement](#)
- Maintain a carbon data collecting and reporting system
- Seek to reduce carbon emissions
- Optimise energy efficiency
- Where practicable use alternative and renewable energy sources

SOCIAL RESPONSIBILITY

- Recognise and comply with Breedon's [Social Responsibility Policy Statement](#)
- Integrate social responsibility into business decisions
- Foster fair culture with a supportive workplace
- Promote flexible work practices to encourage healthy work life balance
- Procure goods and services locally where appropriate and practicable

How to report a concern

If you believe there has been a breach of the Code we would encourage you to report it by one of the following methods:

Contact a member of our senior management:

- Rob Wood - Chief Executive Officer
+44 (0) 1332 694444
- James Brotherton – Chief Financial Officer
+44 (0) 1332 694444
- James Atherton-Ham - Group General Counsel
+44 (0) 1332 694444
- Mike Pearce - Managing Director - GB Materials
+44 (0) 1332 694010
- James Haluch - Managing Director - GB Surfacing Solutions
+44 (0) 1332 694010
- Jude Lagan - Managing Director - Cement
+353 (0) 44 9379200
- Terry Lagan - Managing Director - Ireland
+353 (0)1 885 9999

How to report a concern

Use our confidential reporting line: Safecall

They can be contacted by:

Telephone: from England, Scotland, Wales and Northern Ireland call the freephone number **0800 915 1571** or from the Republic of Ireland call **1800 812 740**

Online: leave a message on the Safecall website: www.safecall.co.uk/report

This is a 24 hour / 7 day independent confidential reporting system