

Supplier Code of Conduct

Corporate integrity, responsible sourcing and the safety and wellbeing of workers in the countries where we do business are of paramount importance to the Breedon Group (**Breedon**).

These core principles are reflected in this Supplier Code of Conduct (**Code**), which establishes the minimum standards that must be met by any entity that supplies products or services to Breedon (**Supplier**).

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 judgment in its application.

We have made a commitment to work only with those whose standards are consistent with ours.

To support our commitment, each Supplier agrees that:

- they will comply with the requirements in this Code; and
- they have appropriate systems in place to ensure continuous compliance and to demonstrate such compliance; and
- any breach of this Code will allow Breedon to terminate its relationship with the Supplier with immediate effect.

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

Business Ethics

- 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; and
- avoid conflicts of interest and not gain improper advantage or preferential treatment.

Business Integrity

- 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; and
- comply with the UK's Bribery Act 2010 and Ireland's Criminal Justice (Corruption Offences) Act 2018 irrespective of the jurisdiction in which you operate.

Circular Economy

- recognise and comply with *Breedon's Circular Economy Policy*;
- 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; and
- maximise use of sustainable, responsibly sourced or alternative materials.

Compliance with Law

- 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; and
- communicate the existence of and need to comply with all Relevant Laws within your supply chain and workforce.

Data Privacy

- only use 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; and
- comply with the provisions of the General Data Protection Regulation.

Discrimination, Bullying and Harassment

- recognise and comply with *Breedon's Diversity and Inclusion Policy*;
- provide equal treatment and opportunities for all workers;
- not tolerate bullying, discrimination, harassment or unwanted sexual behaviour;
- not coerce, intimidate or discriminate against anyone; and
- create an inclusive working environment for all.

Energy and Carbon

- recognise and comply with *Breedon's Energy and Carbon Policy*;
- maintain a carbon data collecting and reporting system;
- seek to reduce carbon emissions;
- optimise energy efficiency; and
- where practicable use alternative and renewable energy sources.

Environmental Biodiversity

- recognise and comply with *Breedon's Biodiversity Policy*;
- 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; and
- protect ecosystems, biodiversity and habitats to maximise your contribution to nature conservation.

Fair Competition

- practice fair competition, openly and honestly;
- not engage in any agreement, arrangements, 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: and/or
- not participate in any other form of cartel practices with competitors, such as price fixing, dividing up territories or allocating customers.

Fraud and Tax Offences

- not claim for something which you are not entitled to;
- not knowingly, dishonestly or recklessly misrepresent the amount of time spent or materials used;
- not conceal defects or other matters, falsify records or fabricate evidence in relation to a claim;
- account for and pay all taxation when due to the relevant authorities;
- not dishonestly abuse your position;
- not either knowingly or unknowingly engage in the facilitation of tax evasion and take reasonable steps to prevent the facilitation of tax evasion; and
- not engage in extortion, coercion, embezzlement, misappropriation, false representation, theft, forgery or concealment of material facts or collude with others to do so.

Health, Safety and Wellbeing

- provide a safe and healthy workforce for all your employees;
- recognise and comply with *Breedon's Health, Safety and Wellbeing Policy*;
- 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; and
- report and learn from all incidents at our sites.

Modern Slavery

- not use child labour or any form of forced, bonded or involuntary labour;
- ensure there is no modern slavery within your supply chain and work with us to ensure Breedon maintains compliance with the UK's Modern Slavery Act;
- have a zero tolerance approach for human trafficking;
- not allow any practice which would restrict free movement of employees; and
- ensure all working conditions, hours, wages and benefits comply with Relevant Laws.

Quality

- recognise and comply with *Breedon's Quality Policy*;
- work with us to achieve our commitment to providing our customers with quality products and services;
- strive to continually improve and share good practice; and
- comply with compliance obligations, including relevant industry, legal and regulatory codes of practice including ISO 9001 and relevant sector schemes.

Sanctions

- respect that Breedon needs to know its external parties and be transparent about the real beneficial owners with whom Breedon conducts business;
- respect and observe that Breedon is vigilant in watching for external parties who may be on a sanctions list or may have a related company in a country subject to sanctions; and
- report any queries or concerns regarding sanctions laws and regulations when conducting business with Breedon.

Sustainability

- recognise and comply with *Breedon's Sustainability Policy and Environment Policy*;

- work with us to achieve our commitment to operating our business in a sustainable manner by:
 - protecting the environment
 - preventing pollution
 - mitigating your environmental impacts on surrounding communities;
 - improving sustainable development; and
- ensure your supply chain complies with the applicable ISO 14001, ISO 50001 and BES 6001 certifications.

CERTIFYING COMPLIANCE AND AUDIT

The Supplier shall provide written confirmation to Breedon on request that:

- it has appropriate systems in place to monitor its compliance with this Code; and
- it is able to comply with this Code for the duration of its relationship with Breedon.

In addition to the written confirmation as stated above Breedon may conduct audits and inspections to verify the Supplier's compliance with this Code.

SELF-MONITORING AND REPORTING BREACHES

The Supplier shall monitor its compliance with the Code and shall report any breaches (actual or suspected) of this Code as soon as possible to the Compliance Team.

The Supplier shall not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this Code or questionable behaviour, or who has sought advice regarding this Code.

BREACH, REMEDIATION AND TERMINATION

Where Breedon becomes aware of a breach of this Code by the Supplier or its workers, Breedon may either:

- immediately terminate its business relationship with the Supplier (including any contracts); or
- require the Supplier to produce a remediation plan specifying the actions that the Supplier will take that will lead to compliance with the Code. If the Supplier fails to implement it within a reasonable time, Breedon may immediately terminate its business relationship with the Supplier (including any contracts).

WHERE DO I GO FOR HELP OR ADVICE?

If you have any questions or concerns, immediately contact the Compliance Team or you can report them anonymously via the whistleblowing hotline, the details of which are set out below:

| Name | Telephone and e-mail |
|--|---|
| James Atherton-Ham Group General Counsel | D: 01332 694404 M: 07514 315949 james.atherton-ham@breedongroup.com |
| Lorna Coxon Head of Legal | D: 01433 622323 M: 07802 873723 lorna.coxon@breedongroup.com |

Safecall details:

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. Your call will be transferred to a specially trained person who will assist you further

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