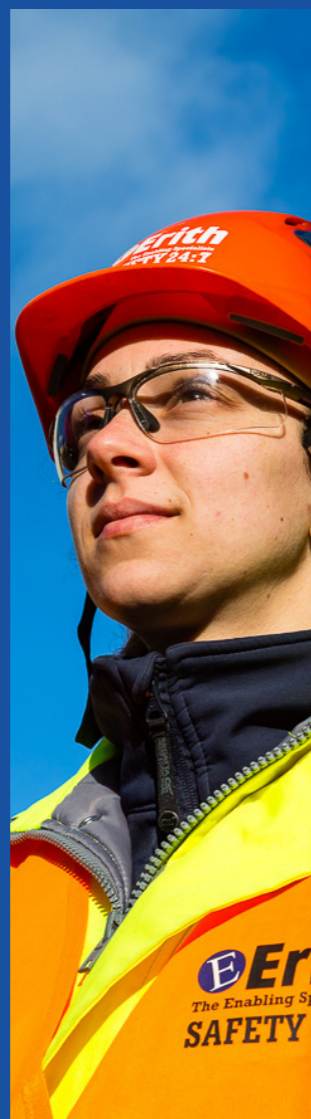




# Code of Conduct

2022 Edition





## A guide:

Leadership Statement	> 3
Our Values	> 4
What is The Code?	> 5
People and the Planet	> 6
Integrity and Fairness	> 7
We Safeguard Erith	> 9
Your Responsibilities	> 11

# Leadership Statement:

Dear Colleagues,

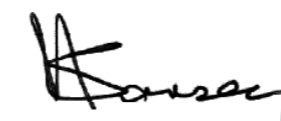
We are **Erith**, a family-run, employee-owned trust founded in 1967 by Tom Darsey. The company's ethos then, as it is today, is one of quality of service and client satisfaction.

This **Code** of Conduct (**Code**) explains what we stand for and what is expected of us all, individually and as a team and at every level.

Everyone of us is responsible for understanding our **Code**, so please read it, discuss it, and apply it to your daily work. Upholding Erith's reputation is a responsibility we all share.

We understand that living by our values and this **Code** may not always be easy. You may face conflicting pressures and dilemmas, but we know that making the right decisions takes courage and we are confident that this **Code** can give you the guidance you need to do so. When in doubt, be open and discuss possible dilemmas with your colleagues or manager.

We recognise our people are our greatest asset and our success begins with you. Erith is a great company and by staying true to our values and this **Code**, together we will continue to deliver future success.



Steve Darsey  
Chairman



*Our values are reflected in*

**We Are Erith.**

**E**

### Excellence

We are always striving to do more and be great even if that means making errors along the way.

Great execution is certainly paramount, but when a person is learning, growing and evolving, mistakes will be made.

The effort, will and desire to learn is excellence. [Delivering excellence](#) doesn't just happen.

**r**

### Respect

This requires empathy, consideration, and a willingness to help.

We must be dedicated and patient in all situations to live up to our core value of respect, which also includes openness.

We believe openness can be expressed with four words: [listening](#), [communication](#), [tolerance](#), and [curiosity](#).

**i**

### Integrity

This is the practice of being honest and showing a consistent and uncompromising adherence to strong moral and ethical principles and values.

In ethics, integrity is regarded as the [honesty](#) and [truthfulness](#) or accuracy of one's actions.

**t**

### Teamwork

We are [one company](#), [one team](#).

We accept accountability for our individual and team responsibilities, and we meet our commitments.

We take responsibility for our performance in all our decisions and actions.

We are committed to the safety and well-being of all our employees.

**h**

### Honesty

This is demonstrated by what we say and by what we do. It impacts our entire life; our jobs, our relationships, our own feelings about ourselves and the actions we take.

It can move us forward and allow us to [feel good](#) about what we do.

# What is The Code?

The **Code** communicates the basic principles that each of us must observe when acting for or on behalf of Erith. It explains what we are committed to and what is expected of you as an employee.

The underlying policies give further practical guidance on the various topics in the **Code**. The **Code** and policies apply to all individuals employed by Erith, regardless of the type of contract or the location of their work.

The **Code** and policies also apply to individuals working for Erith through a third-party contract.

The **Code** and policies do not cover every situation that may occur, nor do they remove the need for using common sense and professional judgment. We expect you to be mindful of your and Erith's reputation.

Through our business compliance programme which follows a continuous process of risk assessment, we will ensure that you receive the appropriate level of support and training in the **Code** and our underlying policies. Training will be delivered through our e-learning compliance portal and will be specifically tailored to your responsibilities.



# We care for *People* and the *Planet*

## Environmental and Sustainability



We have strived to consistently reduce the impact we have on the planet.

We believe it is our responsibility to actively reduce our impact on the environment and have a strong track record of delivering sustainable solutions and innovations in the work that we do. It is our ambition to grow our business whilst respecting the planet.

We pay specific attention to reduce our CO<sup>2</sup> emissions and consumption of water, energy and materials, and to increase the use of renewable energies. We also focus on reducing waste through recycling and reusing.

We expect you to contribute to these ambitions and we encourage you to continuously introduce, develop and improve sustainable initiatives in your daily work.

## Community and Social Value Initiatives



We invest into the community and providing community initiatives are crucial factors in the development and prosperity of our business.

Our continued commitment to our local communities ensures stakeholders are not only informed and protected from potential disruption but that we are providing economic benefit – by using local suppliers, local labour where possible and providing support and donations to communities.

Wherever possible we aim to engage with as many local schools in close proximity to our sites, to provide an insight into the construction industry as a whole and a 'day in the life' at Erith.

## Human Rights and Modern Slavery



We respect the dignity and human rights of all people.

We do business with respect for people's fundamental dignity and their human rights. We expect you to ensure that you comply with our Company's commitments to human rights and modern slavery.

We encourage you, as well as our customers, suppliers and other business partners and other people affected by our activities, to let us know of any concerns you may have, or suspect any abuse of human rights, including modern slavery.

## Health and Safety

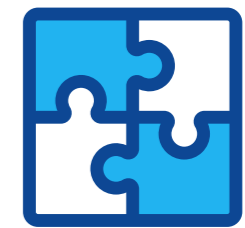


People are the heart of our Company. This means that we always put health and safety first.

We all have a duty to work safely, whether we are at our workplace, visiting sites, meeting with customers or travelling. We must always follow safety rules and procedures and make sure you know what to do if an emergency occurs at your workplace, or at any place that you are visiting.

The mental and physical wellbeing of us all, is an important part of a healthy and safe workplace. We encourage you to look out for each other and talk to your colleagues or manager if there are any concerns.

## Equality and Diversity



We treat people equally and fairly, based on the principle of non-discrimination.

We respect cultural and individual diversity and promote inclusiveness. We employ, reward and promote people based on the principle of equal opportunity, without distinction according but not limited to race, colour, gender, sexual orientation, religion, national or social origin, age and disability.

A key aspect of safeguarding employees is also to ensure that harassment, in whatever form, does not occur. Treat your colleagues with respect and fairness, and avoid situations that may be perceived as inappropriate.

We do not tolerate physical, verbal, sexual or psychological harassment, bullying, abuse or threats.

# We conduct business with *Integrity* and *Fairness*



## Anti-Bribery



We do not tolerate any form of bribery. It is our principle never to accept, ask for, engage in, make, offer, promise or authorise any bribes to anyone, in any place, at any time.

With bribery we mean giving or receiving anything of value to or from any person, or commercial parties, to obtain or retain business, influence decisions, or secure an improper advantage in the conduct of our business.

This also includes bribery through others, such as third parties, and making facilitation payments. Be sure to always follow the applicable laws and appropriate policies when providing or receiving anything of value, such as gifts, entertainment, hospitality and charitable donations.

## Competition



We are committed to the principle of vigorous but fair competition. We strive to win, but we always compete in compliance with competition laws.

Our business relations with customers and suppliers, as well as occasional contact with competitors, require careful attention to competition rules wherever we do business.

For example, situations in which we are in direct contact with a competitor, or when we indirectly exchange information with competitors through professional and trade associations.



# We conduct business with *Integrity* and *Fairness*

## Gifts, Entertainment, Hospitality and Donations



We offer and accept gifts, entertainment, hospitality and charitable donations in an appropriate and transparent manner, only occasionally and never to unduly influence business decisions.

We work with our customers, suppliers and other business partners to grow together. This also involves creating goodwill, fostering long-lasting business relationships and showing appreciation. However, gifts, entertainment and hospitality should never influence, or appear to influence, the integrity of business decisions or the loyalty of the persons involved.

If you give or receive gifts, business meals, entertainment or hospitality, make sure that they are appropriate and proportionate. Give and accept them openly and unconditionally.

Always safeguard our reputation, exercise professional judgment, and avoid undue pressure on the recipient. We may provide charitable donations, but we always do so in a transparent and professional manner.

## Conflicts of Interest



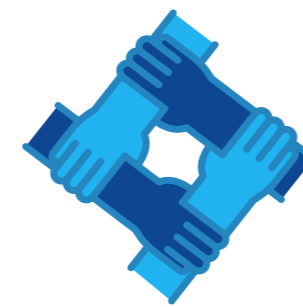
We avoid conflicts of interests between business and personal interests.

We each have a responsibility to make decisions in the best interest of Erith, without being influenced by personal considerations.

It is important to avoid situations in which a conflict could arise between the Company's and your personal interests. Even the appearance of such a conflict should be avoided.

If a conflict of interest could exist or appears to exist, be transparent and discuss this with your manager.

## Relationship with our Business Partners



We seek to do business with partners who share our values and commitment to responsible business conduct.

We believe it is important to work with customers, suppliers and other business partners who share our values and commitment to responsible business conduct.

Our continued success depends upon this commitment. We expect our business partners to act with integrity and fairness, observe applicable laws, and behave in a manner consistent with this **Code**.





# We Safeguard Erith



## Fraud



We do not accept any kind of fraudulent behaviour.

Fraud can have a significant financial and reputational impact on our Company. In order to protect the interests of all stakeholders, it is essential that we are alert of and prevent fraudulent behaviour. Fraud covers a very broad range of activities.

Examples of fraud include falsifying documents, misappropriation of company assets and resources - including theft - and, in some cases, intentional misapplication of internal rules. Inaccurate information can mislead or deceive both internal and external stakeholders, which can have severe and long-lasting consequences for our Company.

We expect you to be alert to fraud and report any suspicion of fraud to your manager, or send an email in confidence to [compliance@erith.com](mailto:compliance@erith.com).

## Responsible Communications



We always communicate in a responsible way. In order to protect Erith's reputation, we need to ensure that we always communicate in the right way, in the right place, at the right time and to the right audience.

When communicating externally on behalf of Erith you are expected to follow our internal policies.

Remember that any online communication, referring to Erith, including social media, could affect the reputation of our Company and our brands. When you use social media, inside or outside work, do this in a responsible manner, always using common sense and professional judgment.

## Confidential Information



During our daily work we also come across all kinds of confidential information.

Examples include budget, financial statements and audit reports, business plans and strategies, contracts, and tenders.

It is essential that we respect and protect our Company's confidential information and only share and use it to the extent allowed. This also applies to the confidential information of others.

# We Safeguard Erith



## Privacy and Data Protection



We protect the privacy and personal data of all individuals, including our employees, customers and other business partners.

We are committed to comply with all relevant data privacy requirements, it is therefore important that we all ensure that we handle personal data, or any data that can relate to an individual, with care and for legitimate business purposes only, in line with applicable laws and our own privacy rules.

## Use of Company Assets

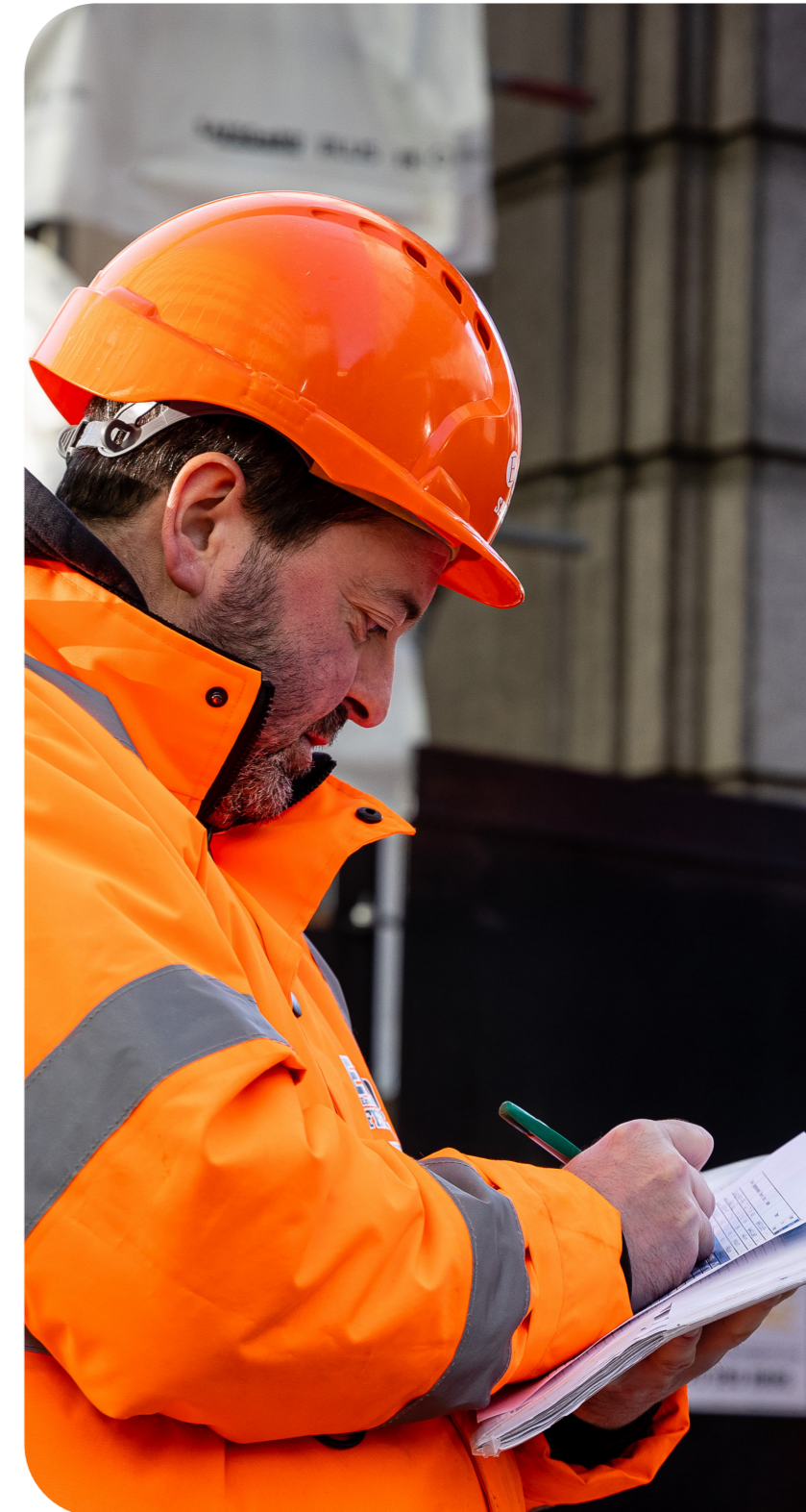


We safeguard our company assets.

Wherever we work and whatever our role, numerous company assets are entrusted to us.

Think for example of company vehicles, laptops, IT systems, mobile phones, tools and materials.

We all are required to use them carefully and professionally for their intended business purpose only, unless other use is specifically authorised.



# Your Responsibilities

We expect you to always act in accordance with the law, our **Code** and our underlying policies. We expect everyone to promote a culture of openness, in which we all feel comfortable raising questions, dilemmas and concerns regarding the interpretation of, or adherence to, this **Code**.

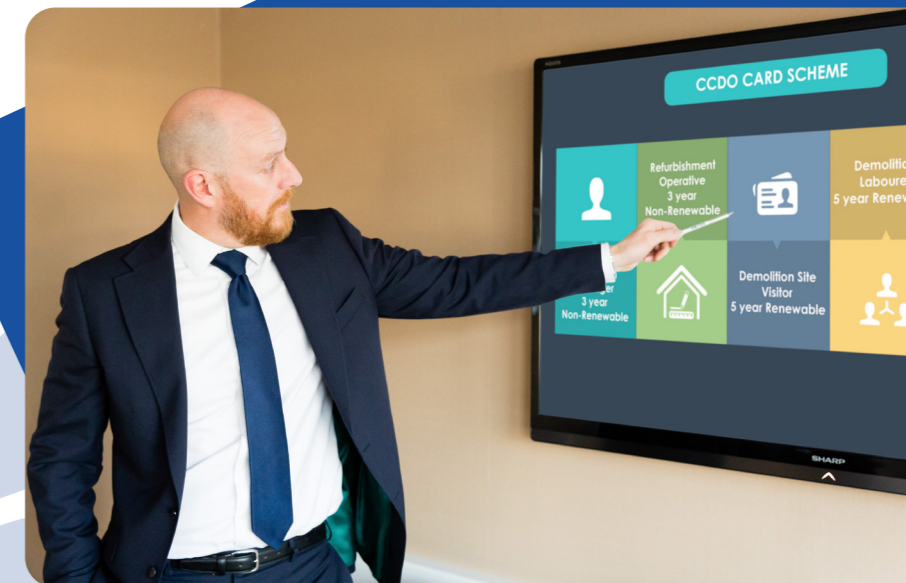
Those in management positions have greater responsibilities: you have an essential role to play in upholding our reputation. You are expected to lead by example and create a transparent and open environment, in which concerns, or suspicions can be raised without fear of retaliation.

## What to do when you are in doubt

The **Code** and policies do not cover every situation that may occur, nor do they remove the need for using common sense and professional judgment. If you are in doubt about what to do, ask yourself the following questions:

- 1. Does it feel like it is the right thing to do?**
- 2. Is it legal and does it seem consistent with our values and our **Code**?**
- 3. Does it reflect well on our Company?**

If the answer is 'no' to any of these questions or if you are uncertain, stop and seek guidance. Discuss the matter with your colleagues or your manager. Professional advice can always be sought when appropriate.



# Your Responsibilities

## Let us know



Do you have a concern about a possible breach of our **Code** or the underlying policies?

Let us know.

Remaining silent may only worsen the situation and undermine trust. When you honestly and truthfully raise a concern, you help to protect our Company, your workplace, and ultimately your colleagues and yourself.

So let us know by raising the concern with your manager or send an email in confidence to [compliance@erith.com](mailto:compliance@erith.com).

## Disciplinary Measures



A breach of the law, our **Code**, or any of the underlying policies can have serious consequences for our Company and the individuals involved, including **you**. The same goes for turning a blind eye to any such breach.

As an individual you can be held liable and fined or sent to prison. In addition, our Company can be held liable and fined, and its reputation can be severely damaged.

A breach of the law, our **Code** or the underlying policies can also lead to disciplinary measures, which may include dismissal.

Using a third party or other means to bypass this **Code** is never allowed.

## Questions?

For any questions please contact your manager, or send an email to [compliance@erith.com](mailto:compliance@erith.com).

For further information, please refer to our policy register on [SharePoint](#).

**Erith Contractors Ltd**

Erith House  
Queen Street  
Erith  
Kent  
DA8 1RP

☎ 03709 508 800  
✉ hello@erith.com  
🌐 www.erith.com

