

NG BAILEY GROUP

**ETHICAL WORKING
POLICY**

CONTENTS

1. INTRODUCTION	2
1.1 What do we deliver	2
1.2 Controls and governance of this policy	2
1.3 How we choose our projects	3
1.3.1 The Ethics Test	3
1.4 How we will deliver our work	4
1.5 How we treat our people	5
1.6 Breaching the policy	6
2. APPENDIX	7
3. DOCUMENT HISTORY	8
3.1 Document owner and approval	8
3.2 Change amendment summary	8

1. INTRODUCTION

This policy applies to all persons working for the NG Bailey Group of companies (this includes but is not limited to NG Bailey Group Limited, NG Bailey Limited, NG Bailey IT Services Limited, NG Bailey Facilities Services Limited and The Freedom Group of Companies or on its behalf in any capacity. It summarises the projects we will and will not embark upon, how we will deliver our work, and how we will invest in our people.

1.1 What do we deliver?

NG Bailey's mission is to responsibly, design, build, operate, and maintain buildings, infrastructure, and services.

As a family-owned business, our heritage and values influence our approach to business and drive our motivation to make a positive contribution to society. Our vision is to create exceptional environments for present and future generations.

1.2 Controls and Governance of this policy

This ethical working policy is designed to provide a framework to enable our people to consider the ethical implications associated with potential projects, how we deliver our work and how we treat our people.

Before NG Bailey proceeds with any bid for a contract or project, our bid teams review each prospective opportunity against the requirements of this ethical working policy. The appendix provides a decision tree to help determine whether the project being considered is subject to further consideration by the committee.

If our people have any uncertainty regarding the acceptability of a project that is not outlined in this policy or Appendix A then the proposed bid should be referred to the Ethical Working Committee for consideration.

The Ethical Working Committee consists of:

- Chief Financial Officer (Chair)
- Head of Responsibility (Secretary)
- Company Secretary
- Family non-executive director and/or family representative

The Ethical Working Committee will consider the information presented in the Ethical Working Evaluation form and vote as to whether the potential project is compliant with the policy. Where the project is non-compliant, we will not pursue the contract.

If the Ethical Working Committee delivers a tied vote, then the project brief will be escalated to the Chief Executive Officer who will have the casting vote

1.3 How we choose our projects

We work on construction, infrastructure, and power projects throughout the UK. We work across a number of sectors in the UK including commercial property, agriculture, banking, professional services, health, higher education, data centres, rail and infrastructure, power, energy, manufacturing, and defence. On occasion we also provide services on a project basis outside of the UK for existing clients.

It is important to us that the work we deliver not only presents an economic opportunity and but also an opportunity to make the UK a better place to live. We have outlined in the following sections a number of projects that we would not pursue as we believe they do not support our beliefs as a business. The examples provided are not exhaustive and all projects should be considered in line with the ethics test below. If you are ever in doubt about the ethics of a project, it should always be referred to the ethics committee for consideration.

1.3.1 The Ethics Test

Does the proposed project conflict directly with the project scenarios listed within this policy?

YES, do not proceed with the project and please refer the project to the ethics committee

NO, proceed to question 2

Does the project support NG Bailey's mission, vision and commitment to make the UK a better place to live?

YES, proceed to question 3

NO, please refer the project to the ethics committee for consideration

Are you comfortable with the nature of the proposed project?

YES, you may proceed with project in line with your divisional protocol

NO, please refer the project to the ethics committee for consideration

Examples of projects we choose not to support due to a conflict with the NG Bailey mission and/or vision include:

The construction of power generation plants that rely on fossil fuels where there is no capture and storage of CO₂ gases or alternative technology applied to reduce the carbon intensity of the electricity generated.

Projects involving testing on live animals where the benefit is cosmetic, i.e., for human comfort not human need.

Projects which facilitate the manufacture or transportation of indiscriminate armaments*. We will not undertake projects which contravene laws which the UK government has agreed to abide by in pursuit of maintaining national security. In addition, we will not undertake projects where, although not infringing the letter of those laws, our participation would contradict other criteria set out elsewhere in this policy.

We will not work for any government in pursuit of its military strategy unless it is in close alliance with the UK government

* (for the purpose of this policy, indiscriminate armaments are defined as per the Convention on Prohibitions or Restrictions on the Use of Certain Conventional Weapons Which May Be Deemed to Be Excessively Injurious or to Have Indiscriminate Effects as amended on 21 December 2001).

Examples of project work we choose to support include:

The provision of Civil nuclear power in the UK as we believe that such projects are necessary in order to de-carbonise our world. We recognise the risk of nuclear accidents and waste, however, we believe that the rigorous standards of construction, operation and risk management in the UK are more than sufficient to ensure the likelihood of serious accident remains extremely small.

Projects involving scientific research into human disease which are approved in accordance with Home Office guidelines (currently Animals (Scientific Procedures) Act 1986)

Work in support of the UK National Security Strategy, supporting the intelligence and security community as well as the Ministry of Defence where applicable.

We recognise that we need to rely upon the UK government's own decision-making governance, including policies and procedures to provide guidance on permitted activities, determination of allies and expectations of conduct for the UK intelligence and security community as well as armed forces personnel around the world during the consideration of each project.

1.4 How we will deliver our work

We believe that a business must act with integrity and as such, integrity is considered a core element of our company values, alongside Passion, Responsibility and Excellence. We believe that trust in our business will be eroded if we are unconcerned about ethics, the impacts a narrow focus for profit can have on employees and other stakeholders, and our contribution and impact upon the environment and society at large.

We only work by honest and legitimate methods, including how we win work, manage it and report on it. Our Code of Integrity for employees and our Code of Integrity for Business Partners outlines our expectations of employees and business partners in more detail and can be found on our website.

In line with our company values of Passion, Integrity and Excellence we are committed to:

Maintaining a publicly available Code of Integrity which sets our standards and expectations of employees clearly.

Recognising that the scope of the projects we deliver has impacts far beyond those of just NG Bailey. As a result, we committed to upholding and making publicly available our Code of Integrity for Business Partners and Anti-Slavery and Human Trafficking policy.

Our company Values alongside our Code of Integrity do not condone any activity relating to:

Bribery or corruption in either our selling or purchasing activities. Our Code of Integrity for employees sets out our expectations and standards clearly.

We will never knowingly engage with, or procure goods, services or labour from organisations that are in breach of, or refuse to adhere to our, Code of Integrity for Business Partners and Anti-Slavery and Human Trafficking Policy.

1.5 How we treat our people

People are at the heart of our business and our strategy is to attract, recruit and retain the best people in our industry. We value them for their technical and managerial skills, and even more for their attitude and performance – the passion of our teams, the integrity of each individual in them, and the excellence they deliver.

We are committed to:

The safety of our people, our business partners and of the public at large. Safety First and Foremost is our highest priority and we will provide our people with the access to and awareness of relevant policies and procedures alongside the appropriate training, so they are able to manage their personal safety.

We will equip our people with the appropriate Personal Protective Equipment so they are able to perform their role safely. Further detail on our approach to Safety is addressed through our Health and Safety Policy Statement available on our website.

We will strive to be fair in all our people decisions including recruitment performance assessment and retention.

We will continue to train both new apprentices and existing staff for their benefit and ours, in order to have the best trained workforce in our industry.

We will listen to grievances, and have a formal grievance procedure, which is independent, thorough, and fair.

As a firm we uphold our company values by:

Not compelling our staff to work on any of our projects in contravention of their own legitimate personal beliefs.

Being fair and transparent in the management of our people especially in relation to age, disability, ethnicity, gender, religious belief or sexual orientation, gender reassignment, and marriage/civil partnership

Not letting short-term thinking about training costs impact our position in the industry and the impact we have on wider society. We acknowledge the long-term benefits of training our people in valuable professional and life skills.

Not working with organisations that fail to implement basic labour rights as set out in the Fundamental UN ILO conventions¹ e.g., avoidance of child labour, or that actively oppose the rights of workers to freedom of association, e.g., trade union.

1.6 Breaching the policy

If you are concerned that any part of this policy may have been breached then in the first instance you should refer the matter to your line manager, but anyone can raise a concern with NG Bailey by reporting their concerns via the following channels:

We understand that some may find it difficult to speak up directly with NG Bailey contacts or staff and therefore if you feel unable to raise the matter with your NG Bailey contact, for whatever reason, you can report externally through Navexglobal which is a completely independent organisation. You can use one of the following methods:

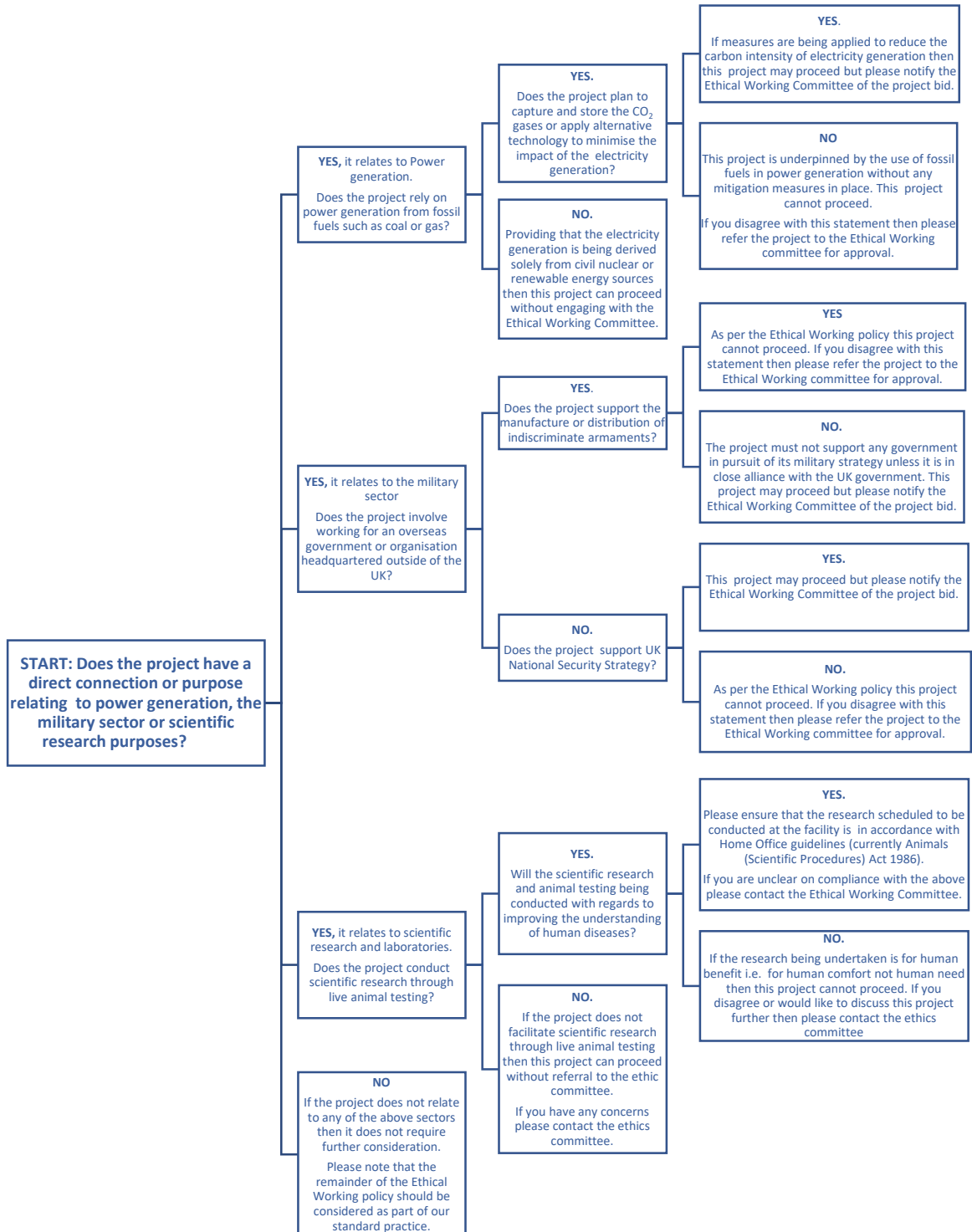
- Call the hotline:
 - UK - Call 0800 890011, then dial 833 626 1550
 - Cyprus - Call 800 90010, then dial 833 626 1550
 - Germany - Call 0800 225 5288, then dial 833 626 1550
- Visit the website: ngbailey.ethicspoint.com
- Alternatively contact us internally via Concerns@ngbailey.co.uk

NG Bailey is committed to creating an environment where people feel they can raise genuine concerns. If you report apparent wrongdoing honestly and in good faith, you will be supported by NG Bailey.

Speaking Up (for further details please see Whistleblowing policy available on our website) is encouraged and individuals who speak up are protected. Please feel confident that you will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation will not be tolerated.

¹ International Labour Organisation. 2017. Accessed online:
<http://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

2. APPENDIX



3. DOCUMENT HISTORY

3.1 Document owner and approval

The Head of Responsibility is the owner of this document and is responsible for ensuring that this policy is reviewed in line with legislation as well as emerging best practice.

A current version of this document is available to all members of staff on the NG Bailey process library. It does not contain confidential information and can be released to relevant external parties.

This policy was approved by Chief Financial Officer and is issued on a version-controlled basis.

Jonathan Stockton

Chief Financial Officer

For and on behalf of the Board of the Company

3.2 Change amendment summary

Document Amendment Summary				
This document is published as a controlled document but will be uncontrolled once downloaded or printed. The document will be reviewed periodically.				
Issue Date	Version	Author	Approved by	Details of Changes
Apr-18	1.0	Natalie Wilkinson	Rob Smith	Policy refreshed
Apr-20	1.1	Natalie Wilkinson	Rob Smith	Policy refreshed – roles updated and Speak Up details added
Jul-22	1.2	Natalie Wilkinson	Jonathan Stockton	Policy refreshed – roles updated and Speak Up details added

Issue Date	Version	Review Date	Author	Owner	Page
Apr-18	1.0	Apr-19	Natalie Wilkinson	Rob Smith	8
Mar-20	1.1	Mar-22	Natalie Wilkinson	Rob Smith	8
Jul – 22	1.2	Jul - 24	Natalie Wilkinson	Jonathan Stockton	8
Review Date is 2 years from Issue Date			Retention Period is 5 years from Review Date		

CONTACT

NG Bailey
Denton Hall
Ilkley
West Yorkshire
LS29 0HH

E: Natalie.wilkinson@ngbailey.co.uk

www.ngbailey.com