



EMPLOYEE CODE OF CONDUCT

Smith & Sons (Bletchington) Limited (Smiths Bletchington) is a long established, independent family run Company serving the construction and allied industries in Oxfordshire and the surrounding counties. Our core business is the production, marketing and distribution of primary and recycled aggregates, supported by inert waste management, plant hire, construction and the operation of coarse fishing lakes.

Smiths Bletchington are committed to undertaking their business activities responsibly and sustainably, meeting the needs of customers, employees and other stakeholders, while managing the social and environmental impacts of our activities.

The directors and shareholders of Smiths Bletchington recognise and value the key role that employees have in ensuring the Company conducts their business in accordance with its core values and the contribution they make to maintaining the Company's culture, reputation and public image.

Purpose of the Code

The Code summarises the principles and values by which Smiths Bletchington seek to conduct their business and acts as guidance to employees when conducting business on behalf of the Company.

Summary of the Code

Employees, Directors and Shareholders should act honestly and fairly at all times in order to maintain the Company's integrity and reputation as a caring and professional organisation.

Above all, Smiths Bletchington respect the rule of law and requires all employees (including temporary personnel, agents and contractors) to conduct business in a manner that ensures compliance with the legislation and regulations that apply to the Company.

Basic Principles

The Code is based on the following principles, employees should:

- Understand and act in accordance with the Company's values.
- Discharge their duties in a safe manner at all times.
- Be committed to the supply of quality goods and services to our customers.
- Act honestly, fairly and in accordance with the law.
- Understand and apply the Company's rules, policies and procedures.
- Treat others with dignity and respect as they themselves would expect to be treated.
- Discharge their duties and responsibilities in accordance with the Terms and Conditions of their Employment.
- Show consideration for the environment when at work.



Environment

Employees should fully acquaint themselves with the Company's Environmental Policy, and understand their roles and duties under the Environmental Management System, thereby contributing to the continued improvement of the Company's environmental performance as a sustainable business.

Health & Safety

Employees have a legal responsibility under the Health & Safety at Work Act 1974 for themselves, colleagues and visitors to the workplace, as well as a moral duty to look after others. Always think Health & Safety first, understand and apply the Company's policies and procedures, apply instructions from management.

Standards of Behaviour

In discharging their Terms and Conditions of Employment, employees should:

- Ensure behaviour meets workplace standards at all times, even when outside work if they can reasonably be identified with the Company.
- Ensure their conduct is not discriminating, intimidating or considered harassment to others, i.e. in contravention of the Company's policies on disability, equal opportunities or age discrimination.
- Be aware and adhere to the Company's policies regarding drugs and alcohol and smoking.
- Adhere to the Company's policies regarding competition law, bribery, money laundering and fraud.
- Be willing to undertake training to allow them to perform their duties and improve performance.
- To drive safely when on company business, particularly implementing the Company's policy on mobile phone use.
- Only use the Company's facilities, property and equipment on company business unless otherwise permitted by a manager in accordance with policies in the Employee Information Binder.
- Respect the privacy of personal data relating to other employees, customers and other stakeholders, particularly when using social media.
- Avoid conflicts of interest between their work duties and private activities.
- Dress appropriately for work at all times, particularly in respect of wearing PPE issued for the safe discharge of duties.

Guidance for Employees

Employees who have any concerns or questions about the Code of Conduct should in the first instance talk to their line manager, or in the event that they feel unable to do so, should contact the Personnel Manager.

This Code of Conduct seeks to guide and help employees to act in good faith. Failure to comply with the Code could be construed to be misconduct subject to disciplinary action under the Company's disciplinary system. In the event an employee has a concern that cannot be resolved satisfactorily, they can always use the Company's formal grievance procedure.



Speaking Up

If an employee has any concerns on a moral, legal or ethical basis about the behaviour of the Company or a colleague, they should report their concerns to the line manager, or if they feel unable to do so, the Personnel Manager or their Director. In accordance with the UK law, an employee reporting such concerns in good faith, is protected from dismissal or other sanctions.

Support

Smiths Bletchington will always support employees acting in good faith and in support of the Company and its' core values and in accordance with adopted policies and the Employee Information binder.

A handwritten signature in black ink that reads "A.W. Smith". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

A W Smith
Joint Managing Director

August 2017