Beton Bauen

SPECIALIST CONTRACTING

CODE OF BUSINESS CONDUCT
POLICY

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Document Control Record	
Date of Last Completed Review	Jan 2026
Date of Next Scheduled Review	July 2027
Document Revision	Revision 5
Revision Date	06.07.2022
Owner / Position	Liam Keene / Compliance Manager

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Scope

This policy applies to all workers and employees (temporary and permanent) and other individuals performing functions in relation to Beton Bauen Ltd, such as agency workers and contractors.

General

The Company observes and complies with all relevant laws and regulations. You are expected to avoid any actions that might actually or possibly cause the Company to become involved in illegal or non-compliant practices. Furthermore, you must report any such acts to management (refer to Whistleblowing Policy).

Accordingly, you must be familiar with the legal regulations and restrictions which affect your area of work. Company management will assist you in this respect, however you are requested to pro-actively pursue knowledge in these areas. The Company expects you to maintain the highest level of business and personal integrity. You are to be honest and forthright in your dealings with the authorities, the public, customers, and other employees.

You are to avoid any contact with individuals, companies and other organisations with whom the Company does, or is likely to do business with that could lead to a conflict of interest. All conflicts of interest should be reported via line management to the appropriate Senior Manager. Some examples of such conflicts include:

- Outside Directorships or other positions of responsibility held by a Company employee.
- Interest in (including shareholdings and financial exposures both personally and through family relationship to) clients of a Company business.
- Personal or family relationship with key management of client and/or competitor companies.
- Personal trading in securities using a position as an employee of a Company business to obtain advantage/leverage.

The above list is not exhaustive and common sense should apply in considering conflicts of interest and the extent to which they should be reported, authorised and recorded in the context of their impact on the Company.

CODE OF BUSINESS CONDUCT
POLICY

Company Image

All Employees are Beton Bauen Ltd representatives. This applies both in and out of working hours. However, you must be particularly aware of this while on Company business.

You are always expected to carry out your duties to the best of your ability.

Confidentiality

Information about the Company (i.e. information that relates to the interests and business activities of Beton Bauen Limited), whether of a technical, business, financial, or other nature, whether it is specific or general, may not be passed on to third parties.

All records of whatever nature of any trade secrets, or confidential information of the company and/or of its suppliers, customers, agents, or contractors which are acquired, received or made by an employee during their employment are the property of the Company and must be surrendered to the Company upon termination of employment or upon request of the Company at any time during the course of employment.

Information relating to customers must be processed in accordance with the Company's Information Data Protection Policies.

These rules specifically refer to the disclosure of confidential information. They do not apply where the information is already in the public domain or discussion is necessary to carry out normal responsibilities. If information is disclosed, and a breach of contract is made, there is a potential personal liability on the member of staff.

The following rules apply:

- You must not disclose to, or discuss with outside parties, details of the business operations of the Company outside the ordinary course of business.
- You must not normally disclose to third-parties' details of past, present or prospective customers, unless the written consent of the customer is held.
- Where confidential information is discussed in the ordinary course of business, it is your responsibility to ensure that the rules relating to confidentiality are complied with, and that information is restricted to the relevant operational area.
- In all other cases, the approval of the MD must be obtained before confidential information is released.
- You must not use confidential information for personal benefit, or for the benefit of a spouse, or a child, or for the benefit of a third party.

A failure to comply with any of these provisions may be treated as gross misconduct.

Situations exist where information is passed to external third parties as a matter of normal business. Information flows of this nature must be kept strictly to the minimum requirements of this business connection and must be within the Company's Data Protection Policy.

CODE OF BUSINESS CONDUCT
POLICY

Outside Employment

Although the Company does not prohibit other employment in your spare time, it is to be seen only as a supplementary activity and must be treated as such. You are expected primarily to devote your loyalty and interest to Beton Bauen Limited. Any such employment may only be undertaken with the permission of your relevant Manager.

You may not carry out any outside employment which could influence your objectivity, your independent judgement, your behavior, or your ability to carry out your duties and responsibilities. Therefore, you may not work part-time for a competitor, and under no circumstances may you pursue other activities inconsistent with the duties you perform for the Company.

If you do engage in employment outside of Beton Bauen Limited, you are responsible for ensuring that your total hours of work do not exceed any legal limits and must keep a record of your hours of work.

Ex-Employees

The following clauses are aimed at protecting the Company's interest against activities that ex-staff may undertake which may be considered to be to the detriment of the Company's interests. It is not the Company's intention, in any way, to prevent staff from making a living by implementing these clauses.

Non-Solicitation

During your employment or for a period of six months after termination of employment, you shall not directly or indirectly attempt to solicit, interfere with or accept instructions or seek to obtain any orders from any person, firm or company who was a customer or client of the Company within the preceding period of twelve months before the termination of employment for the supply of goods or services supplied by the Company.

PROVIDED ALWAYS that the provision of this clause shall only apply to customers or clients of the Company whom the employee had introduced to the Company or with whom the employee had any business dealings or knowledge on behalf of the Company during the period.

Signed:

Position: Compliance Manager

Date: 05/01/2026