

## ETHICAL POLICY STATEMENT

Our ethical policy has been established to set standards and provide guidelines regarding the way J. Coffey Construction Limited should operate in ethical matters. It is important to retain this set of core values and approaches to the process of doing business on a daily basis.

The Ethical Policy focuses on eleven key areas as follows:

### **Employees**

J Coffey Construction Limited values its Employees as a key resource. Good employee communication, involvement & responsibility, both individually and as a team is of central importance and the personal development and optimum use of Employee talent is encouraged at all times.

Every employee has an equal opportunity for personal recognition and career development, no form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people who demonstrate entrepreneurial behavior and show individual initiative in combination with a high degree of knowledge and experience of our products, markets and culture.

### **Customers**

Everybody must play their part in providing quality and efficiency to customers. J Coffey Construction Limited believes that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers.

### **Suppliers**

J Coffey Construction Limited believes in supporting UK trade and therefore will purchase from preferred UK based manufacturing companies if possible. J Coffey Construction Limited will aim to develop relationships with suppliers based on mutual trust and all dealings will be conducted in a professional manner at all times. We also undertake to pay our suppliers on time and according to agreed terms.

### **Community**

J Coffey Construction Limited seeks to comply with legislation affecting its operations. We will seek to serve and support the community in which it operates by providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will take into account the concerns of the wider community including both national and local interests.

### **The Environment**

J Coffey Construction Limited is concerned with the conservation of the environment in its broadest sense, and recognises that certain resources are finite and must be used responsibly. We will therefore work with others toward a consensus on environmental quality standards which are desirable and attainable.

We will pay particular attention to environmental issues including the conservation of energy and natural resources, control of noise levels, recycling of waste material and the utilisation of non-polluting technology.

## Health & Safety

J Coffey Construction Limited provides safe working conditions for all its Employees and will do all that is reasonable and practicable to:

- To provide safe & healthy working conditions, both in the office and site environments, ensuring all necessary precautionary measures have been implemented.
- Protect the health and safety of its employees and minimise any adverse effects on the environment.
- Implement working practices to prevent personal injury and damage to property.
- Making all employees aware of risks and raise awareness of their own responsibilities for the health and safety of themselves and others.

## Human Rights

J Coffey Construction Limited is committed to the prevention of any violation of established Human Rights of any kind, particularly where child labour or undesirable forced acts are involved.

## Social Responsibilities

J Coffey Construction Limited is committed to and encourages collaboration with organisations that support Fair Trade and operate non-exploitative employment practices in their own businesses and supply chains throughout the world. It will not invest in or do business with any organisation that:

- Manufactures or designs weapons, instruments of warfare or torture, or that derives significant revenue from weapons related products or services; or
- Manufactures tobacco products or derives significant revenue from tobacco related production.

## Conflict of Interest

This policy does not allow bribery or political contributions, employees seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interests, this covers the receipt of giving of gifts or hospitality which is prohibited.

## Information

J Coffey Construction Limited regards information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected; this also applies to intellectual property including inventions, trade secrets, technical information, product design, production expertise, customers' information etc.

## Records

Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles. No unrecorded funds or assets should be established or maintained.

J Coffey Construction Limited believes that implementation of this ethics policy:

|  |             |                        |
|--|-------------|------------------------|
| Ethical Policy Statement (Attachment 1.9)                              | Page 2 of 3 | Revision 16 – 10.01.22 |
| Uncontrolled Copy when printed or downloaded from the company intranet |             |                        |

- Sets clear standards for employees.
- Makes good business sense.
- Protects the integrity and enhances our reputation.
- Supports the principles of good corporate governance.

**This policy statement applies to all employees and other personnel engaged in J Coffey Construction operations:**

Signed: *E Barrett* (Original Signed)

Date: 2/2/2023

Eddie Barrett  
Group Managing Director

**On behalf of J. Coffey Construction**