

ETHICS AND BUSINESS INTEGRITY POLICY

Behaving ethically is essential to working with Jones Bros Ruthin (Civil Engineering) Co Ltd. Our values of openness, collaboration, mutual dependency, professional delivery, sustainable profitable growth and innovation are the standards by which we have been judged since Jones Bros Ruthin (Civil Engineering) Co Ltd foundation.

As individuals, collectively and as a company we will:

- Apply the principles set out in the Ethics and Business Integrity Policy in everything we do
- Ensure that we comply with company policies and procedures
- Comply with applicable laws, rules and regulations and where the standards of behaviour expected by Jones Bros Ruthin (Civil Engineering) Co Ltd are higher, we will apply these higher standards
- Seek guidance where we are unsure of the appropriate course of action.

This Ethics and Business Integrity Policy sets out the standards and behaviours that all our employees are expected to meet.

Fraud, Bribery and Corruption

Jones Bros Ruthin (Civil Engineering) Co Ltd takes extremely seriously the effective prevention and detection of fraud, bribery and corruption and any other fraudulent or corrupt activity. It will not tolerate them in any form. The Board is fully committed to promoting a zero tolerance approach across the group. As well as being illegal, fraud, bribery, corruption and any other fraudulent or corrupt activity are damaging to all parties who engage in them.

Corruption usually occurs because some individuals are willing to use illicit means to maximise personal or corporate profit. Corruption includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence and money laundering.

A bribe is not necessarily just a gift of money. It is an action where a person promises or gives a financial or other advantage which is designed to induce any party to perform a function improperly or reward them for having performed a function improperly. The payment or monetary value need not be of large value - for example, it could be an invitation to a sporting event. Fraud is an act of deception intended for personal gain or to cause a loss to another party. The general criminal offence of fraud can include deception whereby someone knowingly makes false representation, or they fail to disclose information, or they abuse a position.

We will not offer, give or receive bribes or improper inducements for any purpose whether directly or via a third party. This prohibition applies to employees, subsidiaries, business partners, suppliers, agents and anyone else acting for or on behalf of Jones Bros Ruthin (Civil Engineering) Co Ltd. Our policy applies to every part of our business. We will endeavour to adopt best practice to uphold the provisions of the Bribery Act 2010 and it will be our aim not to do business with any party who breaches the Act.

We expect all staff to act honestly and with integrity to safeguard Jones Bros Ruthin (Civil Engineering) Co Ltd and our customers' assets, including information, goodwill, property and equipment. We each have a responsibility for fraud prevention, detection and reporting and the Board encourages anyone with reasonable suspicions of fraud or corruption to report them. All cases of attempted, suspected or proven fraud or corruption will be investigated and dealt with appropriately. No employee will suffer as a result of reporting reasonable suspicions.

Jones Bros Ruthin (Civil Engineering) Co Ltd will not penalise any employee by demotion, penalty or otherwise where an employee refuses to accept or pay a bribe, make a facilitation payment or engage in any form of fraudulent or corrupt activity, even if that refusal results in a loss of business to Jones Bros Ruthin (Civil Engineering) Co Ltd.

Political donations can be perceived as unduly influencing a third party. Jones Bros Ruthin (Civil Engineering) Co Ltd does not support or engage in any form of political donations. No employee or Jones Bros Ruthin (Civil Engineering) Co Ltd group company will be permitted to make a political donation on behalf of or in the Jones Bros Ruthin (Civil Engineering) Co Ltd name. We must all be particularly vigilant concerning gifts, hospitality and the actions of third parties engaging in transactions on our behalf. These three areas can frequently involve giving or accepting a bribe in ways which are not immediately identifiable.

Anyone who is offered a bribe or asked for a bribe, or is aware of any form of fraudulent or corrupt activity should report it immediately to their Line Manager or to the Human Resources team.

Gifts and Hospitality

You should always consider whether the giving or receiving of a gift/hospitality is appropriate. It is prohibited to offer or receive gifts or hospitality that could influence or be perceived to be capable of influencing the outcome of transactions or decisions relating to Jones Bros Ruthin (Civil Engineering) Co Ltd business.

We are each responsible for knowing what our business guidance allows in respect of receiving and giving gifts and hospitality. Always seek guidance and approval from your Line Manager before accepting or giving any gifts or hospitality. All benefits must be recorded to ensure transparency and avoid accusations of misconduct.

Conflicts of Interest

All Jones Bros Ruthin (Civil Engineering) Co Ltd staff must disclose or seek direction on any issues that could potentially conflict with their responsibilities to the company.

Conflicts of interest may arise when two or more competing interests could impair the ability to make objective, unbiased business decisions, which are not necessarily in the best interests of Jones Bros Ruthin (Civil Engineering) Co Ltd. Conflicts of Interest may take the form of financial interests in a competitor, supplier or customer business, recruiting a close family member, close or longstanding friendships or relationships with competitors, suppliers or customers or engaging in employment outside Jones Bros Ruthin (Civil Engineering) Co Ltd. In all cases, potential conflicts of interest should be disclosed to your Line Manager.

Working with Others

We must ensure that we maintain our ethical standards and behave respectfully when working with others. The relationships with our suppliers and business partners are based on the principle of fair and honest dealings at all times and in all ways. We expect our suppliers and business associates and joint venture partners to extend the same high standards to all others with whom they do business, including employees, sub-contractors and other third parties.

We expect all of our business associates, joint venture partners and suppliers to adopt the same or equivalent standards as set out in the Ethics and Business Integrity Policy and we reserve the right not to do business with companies where it can be demonstrated that significant violations of the policy exist.

Competition Law

Jones Bros Ruthin (Civil Engineering) Co Ltd policy is that all business activities are carried out in full compliance with competition laws - the laws which prevent anti-competitive behaviour. Competition law prevents us from carrying out any activities that restrict competition and makes illegal activities such as price fixing, unfair pricing, market sharing and refusal to supply customers. We are committed to winning and keeping customers in an open, competitive and legal manner. Any failure to comply with competition

laws could have serious adverse consequences for Jones Bros Ruthin (Civil Engineering) Co Ltd and its employees.

Money Laundering

Jones Bros Ruthin (Civil Engineering) Co Ltd aims to maintain our high standards of conduct by preventing criminal activity through money laundering.

Money laundering involves turning the proceeds of crime into apparently innocent funds with no obvious links to their criminal origins. There is no threshold for the criminal activity and it covers the proceeds of any crime, including terrorist activities, drug trafficking, criminal breach of environmental legislation and health and safety and planning legislation.

Reporting

If there is a concern about malpractice, this should be reported immediately to either a Line Manager or HR Manager.

Review

This policy will be reviewed annually and any changes made communicated to all Jones Bros Ruthin (Civil Engineering) Co Ltd employees.



John Dielhof
Managing Director
November 2023