



CODE OF ETHICS AND BUSINESS CONDUCT

GRADON CONSTRUCTION LTD

**97 BALLOGIE AVENUE
LONDON
NW10 1SU**

STATEMENT OF CORE VALUES

Our approach to business is based upon a core set of values which are consistent with the ethical conduct of our business at all times. It is essential that the ethical business standards set out in this policy are applied by all members of the company, senior managers are required to show their commitment by endorsing this policy and confirming compliance within their own areas of responsibility. It is also the responsibility of senior managers to ensure that the policy is communicated annually to all employees.

The success of Gradon Construction Ltd is dependent on the trust and confidence that we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, through honesty, integrity and honourable conduct. We endeavour to be fair and just in all of our dealings and manifest a commitment to justice, the equal treatment of individuals, tolerance for and acceptance of diversity. We seek to accomplish our business objectives in a manner that causes the least harm and the greatest positive good.

Gradon Construction Ltd demonstrate respect for others through honouring the privacy and rights of all those who have a stake in our decisions, we are committed to treating all people with equal respect and dignity regardless of sex, race or national origin. We are committed to providing a workplace that is free of discrimination of all types including abusive, offensive or harassing behaviour.

We adhere to the laws, rules and regulations relating to our business and accept accountability for the ethical quality of our decisions and omissions which may impact on ourselves, our colleagues and our clients.

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1.0 BRIBERY AND CORRUPTION

Gradon Construction Ltd is resolutely opposed to bribery and corruption and is committed to competing solely on the merit of its products and services. The company will avoid any actions that create a perception that favourable treatment of outside entities was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons of companies with whom Gradon Construction Ltd. does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or the policies of Gradon Construction Ltd. and their clients, or would cause embarrassment or reflect negatively on the company's reputation.

Employees should not accept gifts, money or any other business courtesies from third party organisations or individuals where these might reasonably be considered likely to influence business transactions. Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in the negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing.

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount (other than that received in payment for products or services) from entities with whom Gradon Construction Ltd does or may do business.

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Gradon Construction Ltd. An employee may never use personal funds or resources to do something that cannot be done with Gradon Construction Ltd. resources.

Accounting for business courtesies must be done in accordance with approved company procedures.

1.1 ETHICAL TREATMENT OF EMPLOYEES

Employment within the company will be freely chosen with no use of forced or child labour and we will not discriminate on the basis of gender, colour, ethnicity, culture, religion, sexual orientation or disability and will abide by anti-discrimination legislation.

Employees will be paid for and work hours at least as favourable as the terms established by national legislation or industry standards. Where none exist, the company will set standards by ensuring that wages paid are market reflective and the hours worked are not excessive.

Gradon Construction Ltd is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources and the matter will be investigated impartially without delay.

We are committed to optimizing individual and business performance through the employment of the best people at all levels and through creating an environment in which they are able to and want to contribute to the company's success. By ensuring that individual employees are treated fairly, with dignity and respect we are able to create an environment in which team spirit and commitment to goals is maintained.

Gradon Construction Ltd values all its employees for their contribution to the business. Opportunities for advancement are equal and are not influenced by considerations other than performance, ability and aptitude.

1.2 ANTI-SLAVERY

Gradon Construction Ltd has a zero-tolerance approach to slavery and is committed to preventing acts of slavery and human trafficking from occurring within its business and imposes those same standards on its contractors, suppliers and other business partners.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children in line with our obligations under the Modern Slavery Act 2015.

Prevention, detection and reporting of modern slavery in any part of the business is the responsibility of all employees.

1.3 ETHICAL TREATMENT OF CLIENTS/CUSTOMERS.

Gradon Construction Ltd understand the importance of mutual trust and confidence between ourselves and our clients. All employees should strive to consistently deliver service excellence and value for money which meets client needs and expectations.

Clear and open communication with our clients is key to gaining an accurate understanding of both the client's expectations and the company's obligations. Our goal is to work jointly with the client to meet their needs, if it becomes apparent during discussions with the client that their interests are not well served in the long term by our proposals, we will make this clear even if it impacts negatively on our business.

Should, at any point, we have concerns regarding our clients business practices or processes in that we believe they are contrary to their values and will compromise the values of Gradon Construction Ltd. if followed, we will raise these concerns.

1.4 ETHICAL TREATMENT OF SUPPLIERS

It is the policy of Gradon Construction Ltd to honor the terms of business arrangements made with suppliers and will ensure, as far as is reasonably practicable, that payment for goods received will be made on time in accordance with the agreed terms of trade. We will be honest with our suppliers about goods received and will endeavor to reward suppliers for great service with ongoing loyalty.

2.0 COMPETITION

Gradon Construction Ltd are dedicated to ethical, fair and vigorous competition. Competitive success is built on providing good value and service excellence, therefore we will sell our services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors.

We will not offer or solicit improper payments or gratuities in connection with the purchase of services for Gradon Construction Ltd or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers/clients.

No attempt will be made to improperly acquire competitors' trade secrets or any other confidential information. Employees must not discuss or share with competitors (even indirectly) pricing information or engage in any conduct or practices which would conflict with the laws applicable to the business.

We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property. Employees will not selectively disclose any material nonpublic information with respect to Gradon Construction Ltd, its securities, business operations, plans, financial condition, results of operations or any development plan. We will be particularly vigilant when making presentations or proposals to customers/clients to ensure that our presentations do not contain material nonpublic information.

2.1 CONFLICT OF INTEREST

Every employee has a duty to avoid any relationship or activity that might impair or conflict with the interests of the company or which divides his/her loyalty to the company. Any activity which appears to present such a conflict should be avoided or terminated immediately unless it is confirmed in writing by management that the activity is not detrimental to the reputation and standing of the company.

2.2 COMPLIANCE WITH THE LAW

The company's commitment to integrity begins with complying with laws, rules and regulations whilst conducting our business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or company policy, we will seek the advice of the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations. It is the responsibility of all managers to ensure that they are aware of all laws and regulations which may affect the area of business in which they are engaged, legal or other expert advice should be sought where necessary.

2.3 ACCOUNTING AND RECORD KEEPING

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Gradon Construction Ltd.'s policies and guidelines, as well as all regulatory and legal requirements.

All corporate records are true, accurate and complete, and company data is promptly and accurately entered in our books in accordance with the company's and other applicable accounting principles.

We would not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Gradon Construction Ltd.'s books, records, processes or internal controls.

3.0 POLICIES/PROCEDURES

Gradon Construction Ltd recognise that there are risks involved in carrying out any business activity. Management is responsible for ensuring that policies and procedures are in place to manage those risks. Employees should ensure that they are aware of the risks associated with their activities and that they comply with the policies and procedures in place.

Gradon Construction Ltd is dedicated to maintaining health and safety in the workplace and places the highest priority on protecting its employees whilst at work. We are committed to training and supporting employees in the relevant safety procedures and constantly review the effectiveness of our methods of operation to best protect those in a high risk environment. Gradon Construction Ltd enforce robust procedures that safeguard our employees and the people, property and assets they look after. Managers are expected to be outstanding role models and set the highest standards for health and safety, fostering a positive culture where health and safety is the first consideration in everything we do.

3.1 SOCIAL NETWORKING

Employees who engage in social networking which shows any association with Gradon Construction Ltd, are expected to behave in ways that are consistent with the company's values and policies. Employees must ensure that the company is not exposed to legal or reputational risk and that the safety and security of employees, clients and the general public are not undermined.

3.2 CONFIDENTIAL INFORMATION

Integral to Gradon Construction Ltd.'s business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Employees must not make use of confidential information obtained through their employment for personal gain. The disclosure of confidential information to any third party during or after employment is not permitted. The term 'confidential information' does not include information in the public domain or information which the individual concerned is required by law to disclose.

4.0 ENVIRONMENT

Gradon Construction Ltd will conduct its business with respect and consideration for the environment and aim to minimize any negative impact of our operations through the management of waste, water, vehicle emissions and energy consumption.

Our business is conducted with respect and consideration for the local community and we take steps to minimize any disturbance as a result of our operations. We serve local interest by providing good employment opportunities and paying a fair wage which supports a reasonable standard of living for our employees and their families.

4.1 COMPLAINTS/CONCERNS/SUGGESTIONS

Gradon Construction Ltd will give due consideration to any constructive suggestions and will provide an objective review of any complaints or concerns raised which may include; fraud, misrepresentation, theft, harassment, discrimination and non-compliance with regulations, procedures and policies.

Concerns will be investigated impartially to protect the rights of the person making the complaint. Employees who have concerns regarding unethical behaviour should advise their immediate manager in the first instance and may do so anonymously if they wish. To maintain confidentiality such concerns/complaints should not be discussed with colleagues or other third parties unless specifically authorised to do so or if it is a legal requirement.

4.2 COMPLIANCE

Gradon Construction Ltd aims to maintain high ethical standards in carrying out its business activities and as such, strict adherence to these principles is a condition of employment within the company. For all new staff, employment contracts will include the Business Ethics Policy which should be signed and retained on file.

Managers are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training.

Implementation of and adherence to the Business Ethics Policy is monitored by the company. Where any business with which Gradon Construction Ltd does or may do business, have their own Ethics Policy, these will be reviewed to ensure that they meet the same minimum standards as our own.

Any action by an employee which deliberately or recklessly breaches this Ethics Policy may result in disciplinary action and where appropriate, criminal proceedings will be instituted.

The Business Ethics Policy will be reviewed annually.

This policy has been approved by Mr. James Grady, Managing Director.

Signed: *J Grady*

Date: 08.10.20

Review Date: 07.10.21