



Ethical Code of Conduct

The Code of Conduct provides guidelines. However, it does not address every situation or law that may apply to you.

If you are unsure as to whether a course of action is right or wrong, you should ask yourself the following questions:

- (i) Is the action consistent with our core values?
- (ii) Is it the right thing to do?
- (iii) Does it reflect well on White Horse Contractors Ltd and on the person involved?
- (iv) How would the action be reported in the media, and what would be the reaction of management, colleagues, friends or family?

Our Policies establish and define the internal rules with which everyone must comply in order to conduct business effectively and to achieve success.

Reporting a breach

If you have a concern, or you think that a breach of the Code may be taking place, it is important to report this as soon as possible. Speaking up could avoid damage to the company's reputation, save someone's life and protect you personally. We will not penalise anyone for reporting a breach in good faith, even if their suspicions prove to be unfounded.

There are a number of different ways in which you may raise a concern or get help. You may choose any of the below, depending on your preference and on the particular circumstance.

- (i) Report the issue to your line manager or supervisor;
- (ii) Report the issue to the Compliance Manager or to a member of the Human Resources team;

All reported breaches will be investigated appropriately. Depending on the circumstances, the results of an investigation may include disciplinary action up to and including dismissal. Ultimately, findings will be reported to the Board of Directors. If a crime is found to have been committed, the investigation team will contact the police who may initiate legal proceedings.

Gary Kneller
Managing Director
15th September 2105



1. Laws and Regulations

OUR CODE: "We shall comply with the laws and regulations applicable to our business in all of the countries in which we operate. Laws and regulations represent our minimum standards, but we constantly seek to go beyond these standards."

2. Bribery and Corruption

OUR CODE: "We shall not offer, give or receive bribes or improper payments or participate in any kind of corrupt activity, either directly, or to or from agents or employees of our suppliers, our competitors, our customers or any government official."

WHAT IS BRIBERY AND WHAT IS CORRUPTION? Bribery is to offer, provide or receive something of value, including cash, gifts, hospitality or entertainment as an inducement or reward for something improper. Corruption involves any of these activities: bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement and money laundering.

WE SHALL:

- (i) Only use company funds for lawful, ethical and proper purposes;
- (ii) Comply with all of the laws and regulations that prohibit bribery and corruption (including the Bribery Act 2010) and do everything that we can to ensure that any third parties that we deal with (including our joint venture and alliance partners), do the same;
- (iii) Report any attempts at bribery, blackmail or extortion;
- (iv) Seek to avoid even the appearance of wrongdoing. Even an allegation of bribery may seriously damage the company's reputation.
- (v) Record gifts, hospitality and financial transactions accurately, completely and transparently.

See section 4 'Gifts, Gratuities and Entertainment' for further guidance on this.

WE SHALL NOT:

- (i) Be involved in any form of corrupt behaviour;
- (ii) Offer or give anything of value to a public official (or their representative) to induce them to, or reward them for acting improperly in the course of their public duties. See section 3 'Facilitation Payments' for further guidance on this;
- (iii) Pay more than the fair market value for goods and services as a favour or for something in return.

3. Facilitation Payments

OUR CODE: "We shall not make facilitation payments in any country in which we do business, and we shall not allow others who work for us to make them. We make no distinction between facilitation payments and bribes. Any type of facilitation payment is prohibited, large or small."

WHAT IS A FACILITATION PAYMENT? These are payments or gifts made to public officials in order to speed up or "facilitate" actions that the officials already have a duty to perform. Even though the sums involved may usually be small, and even though the payment of these are often regarded as part of local custom or culture, these payments are illegal in most of the countries in which we operate, including the United Kingdom. Sometimes a legitimate fee is payable for a speedy service provided by the government (for example, a published amount to get a visa or a new passport more quickly from a consulate). Payment of such fees is acceptable, provided that there is a



business need, that the payment is transparent and open, that a receipt is obtained, and that the expense is properly recorded in our financial books.

WE SHALL NOT: Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities.

4. Gifts, Gratuities and Entertainment

OUR CODE: "We shall ensure that all gifts and hospitality are within reasonable, proportionate limits and we shall never offer or accept anything that could be perceived as a bribe or as an attempt to inappropriately influence a business decision."

The exchange of gifts and hospitality can build goodwill in business relationships. However, the value of these must be proportionate, reasonable, transparent and auditable, and the intent and timing of any gift or hospitality must also be considered. Use your judgement and good sense. Ask yourself: would I be happy for the details of any gift or hospitality received or offered by me to be published on the internet or in the local newspaper? If not, the gift or hospitality is probably not acceptable.

WE SHALL:

- (i) Record gifts, hospitality and financial transactions accurately, completely and transparently. Gifts and hospitality must be registered on our Gifts and Hospitality Register;
- (ii) Ensure that any gifts or hospitality that we receive or offer are reasonable and proportionate in value and frequency.

WE SHALL NOT:

- (i) Offer or accept gifts or hospitality if we think that they might impair our or others' objective judgement, improperly influence a decision or create a sense of obligation, or if there is a risk that they could be misconstrued or misinterpreted by others;
- (ii) Accept any gift or hospitality which is offered for something in return;
- (iii) Give or accept gifts of cash, or cash equivalent (such as gift cards or gift vouchers).

Always ask if you are not sure as to whether to accept a gift. Make a record of any gift you receive on the Gifts and Hospitality Register.

5. Fraud, deception, dishonesty & money laundering

OUR CODE: "We shall not defraud or deceive anyone or act dishonestly, or allow anyone else to do so, and we shall protect the company against fraud and money laundering."

WHAT IS FRAUD? Fraud involves deception and dishonesty, or the abuse of your position in order to obtain a material advantage, or to involve anyone else to do so. This 'material advantage' may be money, property, a service, or preferential treatment, and may involve defrauding the company or another party. Making a 'false claim' is also fraud.

We make a 'false claim' if we:

- claim for something to which we do not honestly believe that we are entitled;
- knowingly or recklessly misrepresent or inaccurately record any time spent or materials or services provided;
- conceal defects or fabricate evidence.



- Computer fraud occurs when information technology is used to manipulate programmes or data dishonestly (for example, by altering, substituting or destroying records, or creating spurious records).

Fraud is a criminal offence in the UK, and you may in certain circumstances be prosecuted simply for being careless in allowing fraud to occur, even if you did not deliberately set out to commit fraud yourself.

WHAT IS MONEY LAUNDERING? Money laundering is concealing the proceeds of criminal activity through a series of otherwise legitimate business transactions. It is closely linked to fraud as well as bribery and corruption. Watch out for the following, which are key indicators of money laundering taking place:

- Any situation in which the counterparty will not provide details of its ownership, or where you cannot identify its ownership;
- Irregularities in the way payments are being made;
- Requests to make payments in cash or cash equivalent;
- Requests to make payment in currencies other than those specified in the invoice or contract; Requests to make payments involving unknown or unnecessary intermediaries unless you are clear about their role;
- Where you recognise that there are overpayments.

WE SHALL (IN RESPECT OF MONEY LAUNDERING):

- (i) Assess the integrity of potential customers and partners and conduct appropriate risk-based due diligence enquiries about any counterparties and any funds, goods or services that we are to receive;
- (ii) Report any concerns about money laundering to the Managing Director

WE SHALL NOT (IN RESPECT OF MONEY LAUNDERING):

- (i) Discuss any suspicions of money laundering that we may have with a counterparty unless we are authorised by the Managing Director to do so, since we could impede a proper investigation and/or commit an offence of 'tipping off' if we fail to get prior approval from the Managing Director;
- (ii) Conceal or disguise monies that may be the proceeds of crime

WE SHALL (IN RESPECT OF FRAUD, DECEPTION AND DISHONESTY):

- (i) Act honestly, fairly and openly;
- (ii) Ensure that our invoices are based on clear and complete information and that they comply with our contractual obligations;
- (iii) Accurately record all time spent, and expenses, materials and services provided. In particular, we shall take care when calculating and claiming for payment, extensions of time, insurance, loss and expense and variations, and we shall ensure that all of our assessments in relation to these are as reasonable and accurate as possible, as well as evidenced and substantiated.

WE SHALL NOT (IN RESPECT OF FRAUD, DECEPTION AND DISHONESTY):

- (i) Falsify expenses, or claim for expenses which were not properly incurred in carrying out legitimate company business;
- (ii) Use the company's money or resources for an improper purpose;
- (iii) Withhold payment when we do not honestly believe that we are entitled to do so;
- (iv) Make a 'false claim';
- (v) Make payments in cash or cash equivalents.



6. Political Donations and Contributions

OUR CODE: "Other than when explicitly approved by the Board of Directors, or for an individual in a private capacity, White Horse Contractors Ltd does not participate in any party political activities, or make political donations or contributions."

WHAT IS A POLITICAL DONATION OR CONTRIBUTION? A political donation or contribution may involve cash and non-cash benefits, such as the use of corporate facilities, services or materials, or employee time in order to support a political organisation, party or candidate. Everyone who works for us has the right to participate in politics in their personal capacity, and to pay political contributions out of their own pocket, so long as this does not lead them into a conflict of interest with the company. However, you may not use the company's time or resources to do so, and you may not appear to represent the company or its views when engaging in personal political activities.

WE SHALL NOT, OTHER THAN WHEN EXPLICITLY APPROVED BY THE BOARD OF DIRECTOS, OR IN A PRIVATE CAPACITY:

- (i) Make any political donation, whether in cash or in kind, of any amount on behalf of the company;
- (ii) Host or underwrite fundraising events for political parties or individuals holding or standing for elective office on behalf of the company;
- (iii) Make or solicit payments to non-profit or other organisations which predominantly act as conduits for funds to political parties, or individuals holding or standing for elective office on behalf of the company;
- (iv) Appear to represent the company or its views when engaging in personal political activities.

7. Charitable Donations, Contributions and Sponsorship

OUR CODE: "We shall actively support and sponsor appropriate charities and other non-profit organisations."

WHAT IS AN "APPROPRIATE" CHARITY AND NON-PROFIT ORGANISATION? If we are making a charitable donation or commitment of support using the company's resources, we need to check whether the organisation is appropriate and suitable. It must be genuine and correctly registered

WE SHALL:

- i. Actively support charitable and other non-profitable organisation initiatives;
- ii. Ensure that the charity or non-profit organisation is appropriate and obtain the approval of the Managing Director in advance of a charitable donation of any value, clearly stating why it wants to support the particular charity or non-profit organisation;
- iii. Assess any potential conflict of interest before committing to a charitable cause. See section 8 'Conflict of Interest' ;
- iv. Ensure that we never offer or make any charitable contribution as an incentive or reward for obtaining or retaining business or for any other improper purpose.

8. Conflict of Interest

OUR CODE: "We shall avoid any act in which we may come into conflict or appear to come into conflict with the interests of the company. We shall declare and resolve any potential conflicts as soon as we become aware of them.



” WHAT IS A CONFLICT OF INTEREST? A conflict of interest arises when two or more interests compete, potentially compromising our judgement, loyalty or independence. Often, a perception of a possible conflict of interest may be as damaging as an actual conflict of interest. A conflict of interest (or a perceived conflict of interest) may involve:

- Your employment or relationship with an organisation that is (or is seeking to become) a competitor, client of White Horse Contractors Ltd, or a supplier of goods and services to White Horse Contractors Ltd;
- Your relative or friend having a business dealing with White Horse Contractors Ltd;
- An investment that could affect, or appear to affect, your decision-making on behalf of White Horse Contractors Ltd
- You being asked to serve on the Board of Directors of another organisation.

As soon as you realise that there may be a potential conflict you should disclose it and seek approval or guidance. Failure to disclose a conflict may result in disciplinary action. You should consider the following questions in assessing whether there may be a conflict of interest:

Are the decisions that you make in your capacity as a White Horse Contractors Ltd employee affected or potentially affected? How would your situation appear to your colleagues and to the media?

WE SHALL:

- (i) Notify the Managing Director of any conflict of interest or potential conflict of interest and remove ourselves from the decision-making process.
- (ii) Seek approval before accepting any outside employment, advisory position or directorship

WE SHALL NOT:

- (i) Use our position, contacts or knowledge gained at White Horse Contractors Ltd for personal, or to benefit family or friends;
- (ii) Do anything that might create the impression that customers, suppliers or the client have a contact at White Horse Contractors Ltd who may exert influence on their behalf;
- (iii) Accept gifts and hospitality or offer a charitable donation that could impair our judgement or independence, or be open to misinterpretation. See also section 4 'Gifts, Gratuities and Entertainment', section 6 'Political Donations and Contributions' and section 7 'Charitable Donations, Contributions and Sponsorship' for more information.

9. Competition Law Compliance

OUR CODE: “We shall trade fairly, openly and honestly in all of our markets, and shall not act in a way which prevents, restricts or distorts competition, or seek an unfair competitive advantage.”

WHAT IS COMPETITION LAW? Competition law prohibits business practices that restrict free and fair competition, such as:

- Bid rigging;
- Price fixing;
- Agreements between competitors to share in, or not to compete in particular markets or for particular customers;
- Agreements to avoid certain sub-contractors or suppliers;
- Using one’s size or position to unfairly keep out competitors or to exploit customers or third parties;
- Cover pricing, or soliciting information about a competitor’s bid.



Any agreement with our competitors may potentially raise competition issues. An agreement does not have to be in writing to be illegal. An informal, tacit 'understanding' with a competitor in relation to a commercial behaviour may also potentially be deemed to be inappropriate. Violations of competition law may result in prison for the individual, and in very large fines being levied against the company.

WE SHALL:

- (i) Keep sensitive information such as pricing confidential;
- (ii) Take care when dealing with our sub-contractors, suppliers and other contractors, since any agreement with them (whether in writing or merely by tacit approval) may potentially raise competition concerns;
- (iii) Report immediately to those identified on page 1 if we receive any confidential information that we should not have obtained (if, as part of a tender process for example, we are accidentally sent a competitor's tender by the company who is running the tender);
- (iv) Report any suspicions of possible anti-competitive behaviour

WE SHALL NOT:

- (i) Disclose to or exchange with our competitors any non-public, commercially sensitive information such as price, contract negotiations, capacity, bidding intentions, commercial strategies or customers.

10. Drugs and Alcohol

OUR CODE: "We do not tolerate any White Horse Contractors Ltd people, including those working with us or for us, or any other person connected with our work activity, reporting for work at any of our premises whilst under the influence of drugs or alcohol or If we believe performance or attendance at work is affected as a result of alcohol or drugs.

WHAT IS BEING UNDER THE INFLUENCE OF DRUGS OR ALCOHOL? Being "under the influence of" drugs means testing positive for the presence of any of the following, for which no legitimate and verified explanation may be found: Amphetamines, including Ecstasy, Barbituates, Benzodiazepines, Cannabis, Cocaine, Methadone, Opiates, Any other illegal drug.

Being "under the influence" of alcohol means testing positive to the presence of alcohol above of 0.25mg per 100 millilitres of breath, which is 70% of the current UK drink drive limit of alcohol. White Horse Contractors Ltd people must be within these tolerance limits whenever they report for work. White Horse Contractors Ltd operates a random and 'for cause' testing procedure for drugs and alcohol.

WE SHALL:

- (i) Present ourselves at work in a fit condition to perform our job, free from the influence of alcohol or illegal drugs;
- (ii) Take a positive approach to any employee/worker seeking guidance in overcoming alcohol and/or drug related problems (provided that these problems are raised prior to testing);
- (iii) Notify our line manager of the possible impact on health and safety or fitness to work of any medication prescribed to us;
- (iv) Investigate any instances of drug or alcohol use in breach of the Code and take suitable action (up to and including dismissal or termination of contract).



WE SHALL NOT:

- (i) Tolerate the use of drugs or alcohol by any members of our teams during working hours,
- (ii) Condone, recommend or encourage the consumption of alcohol outside of prescribed safe limits.

WHERE TO SEEK ADVICE: Following an accident, serious occurrence or 'near miss' on a White Horse Contractors Ltd project or in a White Horse Contractors Ltd office, in instances in which someone on such project/office is suspected of being under the influence of drugs or alcohol, the Project Manager or most senior White Horse Contractors Ltd manager on such project/ office should contact the Compliance Manager immediately to discuss the need for alcohol and/or drugs testing.

11. Equality, Diversity and Inclusion

OUR CODE: "We believe that everyone should be employed and promoted solely on the basis of their personal merit and contribution. We are committed to eliminating discrimination among our workforce and to treating everyone with fairness and respect."

WE SHALL:

- (i) Provide equal opportunity and respect for all;
- (ii) Maintain a supportive work environment (see also section 12 'Harassment, Bullying and Discrimination');
- (iii) Comply with all employment laws in respect of diversity and inclusion, and comply with the Equality Act 2010;
- (iv) Hire on the basis of talent, merit and potential;
- (v) Reward using market rates for our industry, and ensure that we apply these fairly and consistently to all of our people;
- (vi) Ensure that our decisions are made fairly and without discrimination;
- (vii) Accommodate cultural or religious practice where possible.

12. Harassment, Bullying and Discrimination

OUR CODE: "We shall not tolerate any kind of harassment, bullying or discrimination by anyone or against anyone who works for us or with us. We believe that everyone should be provided with a safe and secure environment and behave in a professional and respectful manner towards one another."

WHAT IS HARASSMENT AND BULLYING, AND WHAT IS DISCRIMINATION? Harassment and bullying refers to any action or behaviour which an individual or group finds unwelcome, which violates their dignity, or which has a humiliating, intimidating, threatening, violent, hostile, degrading, offensive or discriminatory effect, even if this was not intended by the person responsible for the action or behaviour. We should be particularly sensitive to actions or behaviour that may be acceptable in one culture, but not in another.

Discrimination refers to the treatment of a person or group based on factors relating to characteristics such as age, disability unrelated to the task in hand, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation, union membership or political affiliation. Harassment, bullying and discrimination could include the following:



- (i) unwanted nicknames or demeaning comments relating to any of the characteristics mentioned above;
- (ii) unwelcome jokes or comments;
- (iii) the use of obscene gestures;
- (iv) excluding an individual on the basis that they have a characteristic referred to above, or are associated or connected with someone with a characteristic referred to above (whether or not such individual does, in fact have such characteristic);
- (v) asking questions relating to a person's sexual orientation, religion or political affiliation or any of the characteristics above.

WE SHALL:

- (i) Speak up about harassment, bullying or discrimination;
- (ii) Encourage and support those who challenge or report such behaviour;
- (iii) Intervene to stop bullying, harassment or discrimination;
- (iv) Ensure that there is a supportive working environment for all.

WE SHALL NOT:

- (i) Tolerate any action or behaviour that could be viewed as harassment, bullying or discrimination;
- (ii) Make inappropriate jokes, try to humiliate a colleague, or spread gossip and rumours that might be, or could be perceived as being, hurtful and disruptive;
- (iii) Threaten a colleague with physical or verbal violence.

WHERE TO SEEK ADVICE: Any queries regarding this Code may be addressed to the Human Resources team. Remember, you may be able to resolve matters informally yourself. If an informal approach does not resolve matters, or you feel that the situation is too serious to be dealt with informally, you may make a formal complaint by using the White Horse Contractors Ltd Grievance Rules. You may also report any breaches of this Code to those referred to on page one of this code.

13. Fair Dealing and Fair Payment

OUR CODE: "We shall act with honesty and integrity and deal fairly with our supply chain, partners, competitors and clients, the people they employ and the wider community. We shall seek to ensure certainty of payment and the prompt payment of our supply chain." Our success is dependent upon the strength of our relationships. Honesty, transparency, professionalism and integrity are the hallmarks of our behaviour.

WE SHALL:

- (i) Treat our supply chain, partners, competitors and clients, the people they employ and the wider community in a professional and courteous manner;
- (ii) Communicate with our supply chain, clients and partners on a clear, regular and truthful basis;
- (iii) Develop and maintain strong, long lasting relationships;
- (iv) Select our supply chain based on a fair, objective process and on their competency for the job (e.g. price, service, delivery, quality, health and safety record, reliability and technical ability) ;
- (v) Pay our supply chain promptly and in accordance with agreed contract terms.



14. Health and Safety

OUR CODE: "We shall not compromise the safety of anyone involved in, or affected by our activities. Health and safety, and a zero harm culture are our first priority."

WHAT IS "ZERO HARM"? Zero harm means (in relation to all those who work for us or with us, or to any member of the public): no deaths, no injuries, no accidents and no long-term harm to health. We are committed to eliminating the risk of serious harm from all of our activities, and to keeping our people healthy. Senior managers have a responsibility to provide strong leadership on health and safety. However, responsibility for safety lies with each and every one of us.

WE SHALL:

- (i) Protect the health and safety of everyone involved in, or affected by, our activities;
- (ii) Follow the rules, policies and procedures set out on health and safety;
- (iii) Only undertake work for which we are trained, competent, medically fit and sufficiently alert to carry out;
- (iv) Understand our health and safety roles and responsibilities;
- (v) Challenge and report anything that we believe is or could become unsafe (using our 'near miss' reporting text message system), or reporting to those referred to under 'Reporting a Breach' on page 1;
- (vi) Lead by example, demonstrating our commitment to safety and inspiring others to do the same;
- (vii) Familiarise ourselves with the emergency procedures where we work;
- (viii) Recognise our personal responsibility for our own safety and that of others.

WE SHALL NOT:

- (i) Carry out any task which is not safe, or which could adversely impact our health, or the health of others;
- (ii) Prioritise other objectives over health and safety;
- (iii) Walk past or ignore a potential health and issue, or assume that it is someone else's responsibility.

15. Environment

OUR CODE: "We shall comply with all laws, regulations and rules for the protection of the environment and for the conservation of natural resources. We shall set and exceed high standards of best practice to ensure that we make a positive contribution to the environment."

WE SHALL

- (i) Prevent pollution and demonstrate a positive impact on the environment in all our activities as well as those of our supply chain;
- (ii) Prioritize the use of materials and services with the lowest environmental impact, and with consideration of non-hazardous, renewable, recyclable and reuseable material;
- (iii) Reduce our energy consumption on our sites, in our offices and when we travel;
- (iv) Reduce our water consumption, improve our water efficiency and reduce our waste and polluting emissions;
- (v) Protect wildlife and conserve their natural habitats;
- (vi) Promptly report any environmental incidents (e.g. a spill or release of material to the environment).

WE SHALL NOT

- (i) Breach environmental laws or regulations;



- (ii) Ignore the impact of our activities and projects on the environment.

16. Ethical Sourcing

OUR CODE: "We shall conduct our business to the highest possible ethical standards, and influence our suppliers, clients and partners to operate to the same high standards as ours."

WHAT IS ETHICAL SOURCING? Ethical sourcing refers to the making of purchasing decisions as ethically and responsibly as possible within our commercial framework. We must ensure that any products bought by us or used on our sites are not subject to illegal practices in respect of safety, labour standards, child labour, or human rights offences.

WE SHALL: (i) Ensure an ethical basis to our business practice.

WE SHALL NOT:

- (i) Appoint a supply chain member which is known to trade un-ethically, or who is known to use child labour, or operate standards of safety, labour and human rights that are not in compliance with local laws;
- (ii) Procure products from illegal sources.

17. Proper Business Records

OUR CODE: "We shall maintain accurate and complete business records and accounts of all of our transactions and ensure that these honestly and fairly reflect our business. We shall not alter, destroy, conceal or falsify documents, accounts or records."

WE SHALL:

- (i) Record all information accurately, honestly and in compliance with the law;
- (ii) Ensure that any figures that we record are accurate and substantiated;
- (iii) Ensure that any information we disclose about the company is properly authorised and complete;
- (iv) Show financial integrity in submitting and approving expense claims;

WE SHALL NOT:

- (i) Make a false or misleading entry in a report, record or expense claim or try to influence others to do so;
- (ii) Destroy or alter any information or data that must be kept for legal or litigation reasons or for an investigation.

18. Confidential information

OUR CODE: "We shall keep confidential information safe and protect it from unauthorised disclosure. Confidential information belonging to customers or to other third parties shall be protected in the same way."

WHAT IS CONFIDENTIAL INFORMATION? Confidential information is any information which is classed as confidential, developed by, or entrusted to the company. This could include financial information, know-how, business or marketing strategies, tender documents, and customer, supplier, or employee information. It may be oral, visual, in writing, or in any other form.

WE SHALL:

- (i) Keep all confidential information safe and only share it internally on a 'need to know' basis;



- (ii) Only disclose confidential information to a third party on a confidential basis and with appropriate authorisation to do so;
- (iii) Report any confidential information received in error to the Compliance Manager and immediately return it to its rightful owner;
- (iv) Ask for advice if we think that confidential information may have been compromised;
- (v) Ensure that our customers, suppliers and other third parties protect our confidential information by requiring them to sign our White Horse Contractors Ltd standard form Non-Disclosure Agreement.

WE SHALL NOT:

- (i) Leave confidential information unsecured, or otherwise fail to take care of it;
- (ii) Discuss confidential information in a way that may be overheard in public;
- (iii) Elicit or seek to discover confidential information from another.

19. Data Protection and Privacy

OUR CODE: "We shall respect an individual's right to privacy and treat all personal data as confidential. We shall always comply with data protection and privacy laws."

WHAT ARE DATA PROTECTION AND PRIVACY LAWS, AND WHAT IS PERSONAL DATA? Data protection and privacy laws regulate the collection, storage, disclosure, use and disposal of personal data. Personal data is any information which is capable of identifying a living individual, such as their name, address, date of birth, national insurance number or job title. It is a complex area. Always seek the advice if you are in any doubt as to the position.

WE SHALL:

- (i) Respect personal data and keep it confidential and secure;
- (ii) Ensure that access to personal data is only provided to employees who are strictly authorised to access such data;
- (iii) Only collect the personal data that we need, informing the individuals involved of why we need the data, and of the people to whom we may disclose it;
- (iv) Only disclose personal data to those who have a legitimate need to know, or with the consent of those whose information we hold;
- (v) Dispose of personal data securely;
- (vi) Report losses of personal data promptly to the Compliance Manager

WE SHALL NOT:

- (i) Seek personal data without permission;
- (ii) Use or support databases of "blacklisted" people or supply any information to such databases;
- (iii) Transfer personal data outside its country of origin, or give other markets access to it without ensuring that the transfer is permitted under legislation.

20. Using Company Computer Systems, IT Systems and Telephones

OUR CODE: "Company computer systems, mobile telephones and tablet devices are for use at work. The company permits reasonable and appropriate personal use for non-work related purposes."

Our company computer systems and the information held on these are valuable business assets. They must be used only for the purpose for which they were intended, and we must not use them in any way which could affect their operation or integrity, or which could bring our business into



disrepute. Any information held on these assets should be considered as company property, and therefore as being bound by this Code and by relevant legislation.

Company computer systems include: Desktops, laptops, tablets, landlines, smart and mobile telephones; Computer networks (either private or public); Storage devices such as CDs, memory sticks and hard drives; Any applications using company data; Information stored in or transmitted by email, voicemail, facsimile, electronic files, databases and social media platforms and technologies.

Personal use of company computer systems is a privilege, and not a right. Subject to local laws and regulations, White Horse Contractors Ltd may monitor emails and internet access and usage, whether work-related or not, and will analyse mobile telephone bills in order to ensure appropriate usage, data, texts and costs.

WE SHALL:

- (i) Ensure that, when using company computer systems for business and personal use, these are used in a safe and secure manner;
- (ii) Ensure that all means are taken to protect the device against theft, loss or damage.

WE SHALL NOT:

- (i) Use company systems, hardware and software to create, obtain, or distribute illegal or offensive materials;
- (ii) Expect privacy when using company systems for personal or private use, unless local laws or legislation permit otherwise.

WHERE TO SEEK ADVICE: If we are unsure about what is acceptable use, please contact the Compliance Manager.

21. External Communications

OUR CODE: "We shall communicate or disclose information about the company in a timely, accurate and honest way and only with express permission."

WHAT ARE EXTERNAL COMMUNICATIONS? External communications are any external messages from the company (or anyone we authorise) about us, or our business. They include press releases, communications with news media or journalists, promotional materials or advertisements in oral or written form (including via email and social media).

WE SHALL:

- (i) Ensure that all company communications have received prior internal approval from the Managing Director;
- (ii) Seek approval from both our line manager/ supervisor and the Managing Director before agreeing to any external speaking engagement and seek approval of the content of the presentation;
- (iii) Take care what we say at meetings or at public events, on email, texts and on any social media (including Twitter and Facebook) which could bring the company into disrepute or act against the company's interests;
- (iv) Report all media enquires immediately to the Managing Director who will advise on the appropriate course of action.



WE SHALL NOT:

- (i) Respond to the media, regulators, government agencies or any other external enquiries without express permission;
- (ii) Express our personal views in a way that might lead them to be interpreted as the views of the company;
- (iii) Say or write statements in emails, texts or social media which may damage the company's relationship with its clients, customers or any third parties or which we would not want read in the newspapers.