

CODE OF CONDUCT

Background

The performance and adherence to high business standards is an important part of Bowmer & Kirkland's supply chain requirements. Our Clients are increasingly requiring a commitment by all members of the supply chain to support Corporate Responsibility standards. We believe that our supply chain should similarly endorse this commitment.

Bowmer & Kirkland promote and expect the application of highly compliant legal, ethical, environmental and employee related standards within our own business and amongst our Sub-Contractors and Suppliers. The purpose of this Code of Conduct is for Sub-Contractors and Suppliers to support and adhere to these standards. For the purpose of this Code the term Sub-Contractor will also include those Suppliers who provide materials and equipment to Bowmer & Kirkland.

1.0 Business Integrity

Bowmer & Kirkland insist on honesty and fairness in all aspects of business and expect the same from all those with whom we do business.

Sub-Contractors employed by Bowmer & Kirkland shall act fairly and with integrity towards all persons and organisations that may have an interest in or are affected by its activities. The Sub-Contractor's business activities shall be carried out with honesty, sincerity, care and reliability.

The behaviour of the Sub-Contractor shall not give rise to ambiguity or raise questions or perceptions about integrity. The direct or indirect offer, payment, soliciting of and acceptance of bribes in any form are unacceptable practices. Employees of the Sub-Contractor must not perform or encourage any action that evokes the suggestion of a conflict between the private and professional interests of its employees.

2.0 Compliance with Laws

All business transactions and other activities of the Sub-Contractor shall be carried out strictly in compliance with prevailing laws and under the requirements of good citizenship. This includes, but is not restricted to, laws and regulations on competition, corporate governance, taxation, financial disclosure, employee rights and environmental protection.

Bowmer & Kirkland will exercise care to ensure compliance with all UK and EU competition laws. We expect our Sub-Contractors to fully co-operate and adhere to this principle. No actions are to be taken that could prevent, restrict or distort competition in breach of competition laws. Through training and communications, Bowmer & Kirkland will ensure that relevant staff are aware of competition law issues. Training and procedures will be reviewed periodically as part of Bowmer & Kirkland's fullest commitment to legal compliance.

The Sub-Contractor shall act in a socially responsible manner within the laws of the countries in which it operates in pursuit of their legitimate commercial objectives. The Sub-Contractor shall maintain constructive co-operation with authorities and regulatory bodies both on a local level and a national level in order to comply with such laws.

The Sub-Contractor shall not engage in any activities that are designed to mislead government agencies, tax authorities or third parties and shall not participate in the provision of services from funds gained from criminal acts.

3.0 Respect for Human Rights

The Sub-Contractor shall comply with all legal requirements on human rights.

The Sub-Contractor shall promote equal opportunities for everyone in employment, free from discrimination on the grounds of sex, sexual orientation, marital status, creed, colour, race, religion, age, ethnic origin, nationality or disability.

4.0 Environment

The Sub-Contractor shall respect the environment and its environmental responsibilities. The Sub-Contractor will comply with all applicable environmental laws and regulations and take reasonable measures to prevent damage to the environment.

The Sub-Contractor shall support a precautionary approach to environmental challenges; undertake initiatives to promote greater environmental responsibility, and encourage the development and deployment of environmentally friendly technologies with respect to manufacturing, packaging, transportation, raw materials, energy consumption and end of life disposal.

5.0 Health & Safety

The Sub-Contractor shall comply with all applicable Health and Safety Laws, Regulations and Approved Codes of Practice.

The Sub-Contractor shall ensure that all persons working for them or on their behalf take responsibility for their own Health & Safety and others working around them including members of the public. All workers will be required to be trained and competent for the task in hand and appropriately briefed regarding the risks involved in the task and agreed working methods. They will be required to attend an induction before commencing work and produce proof of training and competence. The Site Rules and Bowmer & Kirkland's 'Safety Requirements for Contractors' document must be adhered to at all times.

Where any individual is in breach of the agreed working methods, Site Rules or 'Safety Requirements for Contractors' document they, or their Supervisor, may be subject to a formal warning or removal from site in accordance with Bowmer & Kirkland's 'Red / Yellow Card' procedure.

6.0 Implementation

The Sub-Contractor's management team and its employees shall comply with the standards set in this Code of Conduct. This Code deals with the most important situations that could give rise to legal and ethical problems, but must not be construed as being exhaustive.

Bowmer & Kirkland will periodically review application of this Code of Conduct. The Sub-Contractor agrees to comply with the Code and acknowledges that any non-compliance may adversely affect relationships with Bowmer & Kirkland.

Should the Sub-Contractor have reasonable cause to feel that a member of Bowmer & Kirkland staff has not supported this Code then a formal written complaint can be lodged. Any such complaint will be investigated in accordance with our Management System.

The Sub-Contractor shall inform Bowmer & Kirkland if any changes occur within their business that may affect their commitment to this Code of Conduct.
