Ethics Policy

1. Purpose

The purpose of this policy is to provide all employees and contractors with a clear understanding of the Excalon's ethical principles applicable to all business activities.

2. Reference Documents

- The Excalon 'Leading Excellence' behavioural framework (HR100-CompFrame)
- Excalon Equal opportunities Policy (HR001-EqualOpps)
- Excalon Recruitment and selection Policy (HR002-Recruitment)
- Excalon Anti-Bribery and corruption Policy (HR008-Anti-Bribary)
- Excalon Anti-Slavery Policy (HR013-Anti-Slavery)
- Equalities Act 2010

3. Policy

We are committed to upholding high ethical standards in all our operations. The Excalon ethical principles are based on our Company values and 'Leading Excellence' competency framework that sets the standards for the way we work at Excalon.

Our Ethical Principles – We are committed to;

- Achieving commercial success through responsible means.
- Conducting our business according to the law and associated regulations
- Honesty, fairness and to treat everyone with respect
- Providing a safe and healthy working environment
- Complete confidentiality
- Fair competition and service excellence
- Creating an environment where everyone's contribution is valued

Our Values on which our ethical principles are built are;

- **Customer** – We listen to our customers and strive to exceed their expectations
- **People** – We manage and develop our people to perform to the best of their ability
- **Team** – We work collaboratively as one team to deliver our vision
- **Performance** – We create high performing teams to delivery performance excellence
- **Innovation** – We actively encourage creative thinking and new ideas
- **Health and Safety** – We drive safety excellence, protecting our people, our customers and our environment

We will live up to our values and ethical principles even when challenged by professional, commercial, personal and social risks and economic pressures. Excalon also recognises the potential impact its operational work activities have on the environment. We are therefore committed, during our work in both urban and rural areas, to reducing the impact as far as is practical to meet both our moral and legal duties under the Environmental Protection Act 1990.

Examples of the kind of unethical behaviour which will not be tolerated are (not limited to);

- Bullying, harassment and discrimination
- Fraud and theft
- Bribery and corruption
- Breach of confidentiality
- The use of company assets or business relationships for personal use or gain
- Unauthorised use or disclosure of company information integral to the success of the Company

Roles and responsibilities

The Board and Senior Managers must always set an example, championing the company values and ethical principles in all their business practices. All employees and contractors must always adhere to the Excalon values and ethical principles.

Non-compliance

It is Excalon's expectation that all employees and contractors should be aware of ethical considerations and should ensure that they act in an ethical manner when engaged on Company business, delivering projects and work to the highest ethical standards.

Any breach of this Ethics Policy will be taken extremely seriously, and may result in disciplinary action including proceedings for gross misconduct. Where the breach is committed by a sub-contracted worker, the contract for services will be reviewed and may be withdrawn.

4. Records Management

All employees must maintain all records relevant to administering this process and procedure in line with Legislative and the company record keeping system.

5. Policy Review

The Company will monitor its policies, processes and procedures to implement changes to improve them and ensure that they comply with best practice, legislation changes and the emerging marketplace.

Version History: HR015 Ethics			
Document Version	**Version Date**	**Revision Description**	**Author**
0.1	01/09/2017	Initial	Katrina Beck
0.2	01/08/2018	Reviewed – Minor amends & formatting	Katrina Beck
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0.2	08/08/2022	No Changes	Alison Scragg
0.3	01/09/2023	Annual Review - No Changes	Katrina Beck

DISTRIBUTION LIST	Role	Location
Company Wide	employees, contractors, subcontractors, partners,	All Offices

Signed on behalf of Excalon Ltd: _____ Kevin O'Donnell | Managing Director