

Haughley Block Plant Ltd takes great pride in its reputation as a progressive and professional company which strives for excellence in all of its endeavours. The Company is conscious of its place within the community and the need to adhere to the highest standards of business conduct and compliance with the law and best practice. Haughley Block Plant Ltd.'s continued success will be assisted by the maintenance of the highest standards of integrity from all employees.

To assist employees in maintaining the Company's reputation, a written Code of Conduct has been developed which defines Haughley Block Plant Ltd.'s basic principles of business conduct. Among other things the Code is intended to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files and communicates as necessary.
- Prompt internal reporting to the persons identified in this Code of violations of this Code.

Whilst the Code outlines the minimum standards of behaviour required of each of our directors, officers, and employees, Haughley Block Plant Ltd also expects all of its personnel and contractors to strive to achieve levels of performance which exceed basic compliance. The Managing Director is strongly committed both to the letter of this Code and to the spirit of best practice underpinning it, and expects similar commitment for all of Haughley Block Plant Ltd.'s employees and contractors.

Please take the time to read the Code carefully. By following these principles, you should feel confident and comfortable that you are conducting yourself appropriately.

Our evaluation of suppliers will ensure their nomination and continuous business depends on various factors such as but not limited to:

- ♣ Previous experience, satisfactory service/performance and reference to appropriate Quality, Safety & Environmental System records.
- ♣ An assessment of the External Provider's resources, safety, quality, environmental systems.
- Third party accreditation i.e. FORS etc. (for aggregate suppliers a separate form will be used to ensure that relevant aggregate BSI certificates and quarry information is available)
- **♣** Recommendation from third parties.
- Company ethical behaviours.
- Legal compliance
- Management systems in place
- ♣ Communication with own supply chain and further management
- Internal stakeholder identification and communication and consultation with parties
- Evaluation of complaints and prosecutions
- Human rights and fundamental rights to work
- ♣ Health and Safety
- Climate change and energy preservation awareness
- ♣ Use of resources awareness
- Site stewardship
- Water use and preservation
- Waste prevention, control and management
- Transport impact awareness
- Employment and skills evaluation and management
- Local community engagement
- Financial stability and overall contribution to the built environment.

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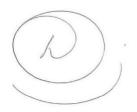


This Code should also be read in conjunction with the various policies, associated plans and handbooks of

Haughley Block Plant Ltd which (among other things) address in more detail some of the topics covered in this document.

Liam Clear Managing Director Haughley Block Plant Ltd

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