

CODE OF CONDUCT AND ETHICS STATEMENT

This Code of Conduct and Ethics sets forth the basic principles we are committed to with respect to our dealings with all of our customers and acts as a guide to assist our employees in meeting the ethical standards reflected in the Code.

Asphalt Group and subsidiaries mission is to help our customers improve the in-service performance of asphalt pavements from design to installation by extending pavement life and reducing the demand for reactive maintenance. We endeavor to provide our clients with a high-quality service and value for money, be mindful of our duty to the general public and thereby to enhance the reputation of the construction industry in accordance with our corporate principles:

SUSTAINABLE

We are in the business of sustainable pavement solutions, delivering a whole-life approach that brings significant improvements in value to every project. We take environmental protection very seriously, our solutions can be reused and recycled at the end of their life.

ADVANCED IN TECHNOLOGY

As exclusive UK distributors of the technically advanced systems, we are proud to be able to deliver a range of proven pavement reinforcing solutions, along with the essential technical advice and hand-on support our customers need.

SAFE

We put the Health and Safety of the general public, contractors and our employees first at all times.

RELIABLE

Our consistent commitment to high-quality delivery and outcomes reduces remedial costs and public disruption.

QUALIFIED

We are fully compliant with NHSS13 accredited by BSI and operate with QCF NVQ qualified operatives demonstrating technically competent workforce.

EXCELLENT SERVICE

We strive to provide our customers with extensive knowledge, responsiveness and consistently high-quality service. We are able to provide technical advice and solutions to suit all specifications.

We have developed a strong reputation for providing the right solutions to our customers. The success we have achieved has been based on the dedication and hard work of our

employees and the entrepreneurial spirit and leadership of our Management Board. Our reputation and our success could not have been possible without commitment to our culture rooted in honesty, loyalty, efficiency and integrity. We believe that this Code of Conduct statement will help strengthen these values and allow us to build on our past achievements.

This Code applies to all of our employees, and failure to abide by this Code will lead to disciplinary actions, proportionate to the breach. Our consultants, independent contractors, agents and other representatives will be required to meet the same ethical standards as our employees and will face the same types of consequences, up to and including termination of any consulting, contract, agency or representative relationship with us. We expect all employees to read and understand the Code of Conduct and Ethics and to always act in an ethical and honest way. Making the right choices and following the laws and regulations that govern our business are critically important to our success.

PROTECTION OF PERSONAL INFORMATION

We respect the privacy of our employees and are committed to protecting their personal information. Such information will only be collected, used and disclosed for legitimate business or employment purposes only or if required by the law. We will also take reasonable steps to protect the confidentiality of personal information we have collected. Further information regarding our employee data protection practices is set out in our Privacy Notice for Employees, which can be found in our Handbook and in our intranet.

RESPECT OF HUMAN RIGHTS

We seek to provide our employees with a workplace free from discrimination or harassment. In particular, we believe that all our employees should enjoy equal opportunities without regard to their sex, race, ethnic background, religion, disability or any other personal characteristic protected by law.

Our employees shall not discriminate against or harass any fellow employees, or any other persons with whom they come in contact in the course of their employment, on the basis of any characteristics protected by law.

Additionally, we strictly prohibit the use of modern slavery and human trafficking in our operations and supply chain. We have and will continue to be committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We expect that our suppliers will hold their own suppliers to the same high standards.

EQUAL OPPORTUNITIES

We value and respect people of different backgrounds, capabilities and opinions. We abide by all applicable labour and employment laws, including those prohibiting discrimination and harassment and those providing for reasonable accommodation of differences. We are committed to providing equal employment and career opportunities to everyone, without discrimination based on gender, sexual orientation, marital or civil partner status, gender reassignment, race, nationality, ethnic origin, religion, disability or age.

FINANCIAL REPORTING

We strive to maintain financial, accounting and business records that fully and accurately reflect all the transactions and business in which we are engaged, in line with all applicable accounting principles, policies and practices. No employee, nor anyone acting on the instruction of any

employee, is permitted to take any action to violate our financial reporting policies or to bypass our system of internal controls.

USE OF CONFIDENTIAL INFORMATION

We require our employees to treat all information relating to our clients, customers and suppliers and our business operations and trade secrets as confidential. We also require our employees to prevent the misuse or improper disclosure of confidential information relating to other employees.

COMPLIANCE WITH ANTI-BRIBERY AND ANTI-CORRUPTION LAWS

We are committed to conducting business in an ethical and honest manner, and are dedicated to implement and enforce systems that ensure bribery is prevented. We have zero-tolerance for bribery and corrupt activities. We are devoted to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

We will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

THE INTEGRATED MANAGEMENT SYSTEM

We have established, implemented and will maintain and continually improve the Integrated Management System in accordance with the requirements of ISO 9001, ISO 14001 and ISO 45001 Standards and the National Highways Sector Scheme 13 for the Supply and Application of Surface Treatments to Road Surfaces.

Health and Safety

Our policy is to maintain a safe working environment for all employees, contractors, and the general public at all times. We accept our duty, so far as is reasonably practicable, to safeguard the health, safety and welfare of our employees and others who may be affected by our actions.

We are committed to meeting or exceeding all health, safety and environmental laws and regulations that apply to us and seek to monitor and review each operation with a goal of continuous improvement.

By the setting and monitoring of H&S-based objectives, eliminating hazards, reducing risks, worker consultation, audit findings, corrective and preventive action and management review, we are committed to the continual improvement of the OH&S Management System in accordance with the requirement of ISO 45001 Standard.

Our commitment to health and safety is explained in our in greater detail in our Health & Safety Policy.

Environment

We recognize the importance of the environment protection and we are committed to operating our business responsibly and in compliance with all environmental regulations and legislation.

By the setting and monitoring of environmental-based objectives, monitoring activities, audit findings, corrective and preventive action and management review, we are committed to the continual improvement of the Environmental Management System.

We endeavor to promote our environmental policy throughout all our operations, to ensure that by awareness and training our employees and contractors make every effort to protect, control and minimise any damage to the environment, from any work operations that they may undertake.

Quality

We aim to provide high-quality, professional and ethical services to our clients, we believe that through implementation of the Quality Management System we can demonstrate our commitment to the ISO 9001 standards. We believe that our Management Team and our employees will support the Quality Management System by their commitment to the following:

- To systematically program, document and control those procedures necessary for the efficient operation.
- To ensure that the Company Quality Policy is implemented by providing adequate training resources and awareness throughout the company.
- By the setting and monitoring of quality-based objectives, monitoring customer satisfaction, audit findings, corrective and preventive action and management reviews.

COMPLIANCE WITH LAW

We believe in complying with both the letter and the spirit of applicable laws, rules and regulations in the jurisdictions in which we conduct business. Our employees shall not engage in unfair or illegal trade practices or violate the laws of the jurisdictions in which we conduct our business.

Signed: _____



Managing Director

Effective Date: 1st October 2019