



Honest & Ethical Behaviour

Standard

Purpose

Lee Bullen Engineering Ltd ('LBE') has approved this Honest & Ethical standard to set out the principles for conducting all aspects of our business in an honest, ethical and transparent manner.

Implementation of this standard and other supporting standards will help to support our principals of ethical behaviours and standards as well as our legal and regulatory obligations.

Scope

This standard applies to LBE, including all employees, suppliers, third-party contractors and partners working for and on behalf of LBE. It also applies to agents, consultants who work on our behalf.

Key principles

We commit to:

- Acting honestly and responsibly
- Taking a zero-tolerance attitude towards bullying, harassment, discrimination or victimisation
- Being on the alert for the facilitation of tax evasion
- Protecting against modern-day slavery

Responsibilities

All employees, contractors and business partners are responsible for ensuring their actions are consistent with the aims of LBE and supporting standards.

Managers in relevant positions are responsible for communication these details to employees, contractors and business partners promoting a compliant working environment.

Useful References

- Fraud Act 2006
- Bribery Act 2010
- Competition Act 1998
- The Modern Slavery Act 2015
- Criminal Finances Act 2017 (Corporate Criminal Offence of the Failure to Prevent the Facilitation of Tax Evasion)
- Theft Act 1968

- Public Interest Disclosure Act 1998
- The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017
- Enterprise Act 2002

Contacting Us

For questions, comments or feedback relating to this you can contact us through <u>enquiries@lbe-ltd.com</u>.

You can also raise your concern or issue to independent organisations such as contacting a regulator.