

The GRAHAM Way

Our Code of Conduct



Welcome to our Code of Conduct 2026

At GRAHAM, we hold ourselves to the highest standards of ethical behaviour. Our reputation and impressive history have been built on integrity and responsibility. We have a strong moral code, and we understand that doing the right thing is not just a choice—it's our duty.

With a team 2,400 strong, and a proven track record of sustainable growth, we are proud to be ranked among the largest construction and facilities management providers in the UK and Ireland.

Our Vision "Delivering Lasting Impact" encapsulates why we do what we do – "we are dedicated to the protection of the environment, our work connects communities, builds a better future and transforms and maintains the places where we live, work and relax."

Our core values serve as the foundation upon which we build our vision. You, our dedicated and loyal staff, are instrumental in achieving our collective success.

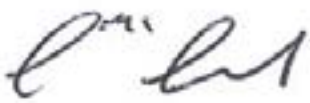
Our Code of Conduct serves as a compass, guiding us in our daily business endeavours. It not only outlines how we should conduct ourselves but also communicates our commitment to trust and reliability. By adhering to this code, we forge robust relationships with others.

We will lead by example in applying the GRAHAM way of working, and we expect the same from each of you.

This code is more than a document; it's a practical guide that consolidates all our policies and procedures. It provides essential support and guidance to navigate our shared journey toward excellence.

Please read it carefully.

The expectation is that you understand and follow this Code. In doing so, you will help us to continue to deliver exceptional results for our clients and the communities we serve.



Courtney McCormick
Group Chief Executive Officer

GRAHAM

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The GRAHAM Way

Our Code of Conduct has been designed to help you understand the GRAHAM way of working; at the core of this document are our core values and the responsible behaviour expected from all our people to support these values.

Applying the 'GRAHAM Way' on a daily basis will allow us to realise our overarching vision, "**Delivering Lasting Impact"**, help drive our **"Forward Momentum"** business strategy, and ensure our core values and behaviours continue to differentiate us. We are corporately and socially responsible, we care about the communities that we work and live in. We think long term to enable us to deliver lasting impact.

OUR CORE PILLARS
ARE CENTRAL TO OUR VISION

- **Our people make us unique**
- **We have ambition built on deep expertise**
- **Relationships define our success**
- **We strive to make a difference**

OUR VISION AND PILLARS HAVE DRIVEN

OUR FORWARD MOMENTUM BUSINESS STRATEGY
WHICH HAS 8 GOALS:

1. A safe, accident free place of work with a culture of fairness, inclusion and respect
2. Differentiated by our approach to quality
3. Leading the industry as an employer of choice
4. Retain Competitive Advantage by fostering collaboration and integrating enhanced productivity, continuous innovation, organisational ambition, and the philosophy of marginal gains to collectively drive significant advancements and market leadership
5. Enhance supply chain relationships by fostering collaboration, fair risk allocation, and early supplier involvement, while integrating innovative digital processes and continuous improvement to ensure efficient, transparent, and sustainable project delivery
6. Recognised as making a positive environmental, social and economic impact by delivering sustainable organic growth
7. Strong brand positioning, becoming the partner of choice for customers and suppliers
8. Continue to strengthen our balance sheet through profitable work with net margins in the top quartile in the industry

OUR BEHAVIOURS AND VALUES
ARE KEY TO REALISING THIS STRATEGY

TRANSPARENCY
We are open and honest, and we value the integrity of our business. Each of us is accountable for maintaining our standard

RESPECT
We cultivate a culture where everyone feels valued and respected for their contribution

INNOVATION
We are focused on long term sustainability. Business improvement is a constant in driving efficiency and progression

COLLABORATION
We work in effective and efficient teams, using our collective strengths to deliver successful projects

PERFORMANCE
We are committed to excellence in quality delivery and health & safety

Our Code of Conduct

Who does the Code apply to?

This Code applies to all our employees and temporary staff at all our business locations across the UK and Ireland.

Here at GRAHAM, we are committed to ethical business conduct and expect the highest standards of integrity to be followed by all employees across the Group.

These guidelines are to be followed without exception by all employees when conducting the Group's business and they apply in addition to the individual policies and procedures produced by all GRAHAM companies.

As colleagues, we must all:

- Make sure we are familiar with the Code and know how to access it.
- Follow the law and our policies and know how the Code applies to your role.
- Use our values to help us "do the right thing".
- Speak up if we think the Code or the law has been breached in any way.
- Ask questions if we are ever unsure.

If something does not feel right, then it might not be the right thing to do. Ask yourself:

- Does it comply with applicable laws and regulations?
- Does it comply with our policies?
- Could it cause problems for GRAHAM, our customers, suppliers, or other business partners?
- How would you feel if it became public?
- How would you feel if you had to explain it to your friends and family?

If you are unsure about the answers to any of these questions, you should ask for help in making the right decision.



Special Responsibilities for Leaders and Managers

While all employees are required to act with integrity, show respect, and build trust, leaders and managers have special responsibilities under our Code.



If you lead or supervise others, GRAHAM requires you to demonstrate ethical leadership and set the right tone by:

- Fostering a positive work environment.
- Modelling appropriate behaviours that are consistent with our Code and values.
- Regularly communicating the importance of ethically sound business practices.
- Responding appropriately and in a timely way to colleagues who seek advice or raise concerns, helping them to feel secure and at ease in doing so.
- Using our CONNECT/PMR process to fairly evaluate employees on what business objectives they achieve and how they achieve them.
- Maintaining accountability among all employees, regardless of position or job title.

What happens if I fail to comply?

All employees must understand that any contravention, or failure to comply with these guidelines could have a serious implication for them and GRAHAM.

Standards set out in these guidelines and other procedures will be strictly enforced, with violations being handled firmly and consistently, and could lead to disciplinary action, up to and including termination of employment.

INVESTORS IN PEOPLE™
We invest in people Platinum

Investors in Diversity Gold UK
Leaders in Diversity
Until June 2026



Q&A

Thoughout this document we have provided numerous question and answer scenarios which help to understand how the type of conduct works in practice.

When to Speak Up?

We all have a responsibility to speak up when we see behaviour or actions that go against this Code and the GRAHAM way of working.

If you are asked to do something, or you see or suspect activity that goes against our values, this Code, or the law, then speak up as soon as possible.

When you report concerns, you help us handle issues properly, fix problems before they occur and remedy situations that have already happened. You also help build trust with each other and with our customers, our suppliers and other business partners.

If Safety, Health or Environmental concerns are noted, works should be paused, the concern reported immediately to the site management team, and then the concern and rectification recorded through the Observations Process on our online portal.

How to Speak Up?

Choose the reporting level that feels right for you:

Tier 1
Trusted Colleagues

- Direct Line Manager
- Upper-level Manager
- FIR Ambassadors



Tier 2
Specialist Colleagues

- Human Resources
- Safety, Health and Environment (SHE)
- Legal Counsel



Tier 3
GRAHAM Governance team
whistleblowing@graham.co.uk

Speak Up Tiers



Speak Up
Tier 1

Some minor issues are best dealt with by talking directly to the person whose conduct is causing concern. If you do not feel comfortable raising the issue with them directly, you should go to your manager or supervisor. They are likely to have insight and experience in the matter and can seek expert assistance if necessary.

At GRAHAM, we also have additional support resources, such as our FIR Ambassadors, who can provide guidance on how to manage or take forward your concern.

We expect that whoever is involved will complete our simple reporting tool so that we can review patterns of behaviours or minor issues to better inform future planning and employee learning.

Speak Up Tier 1 Notification

Speak Up
Tier 2



If you see or suspect conduct which goes against one of our policies, you should consult with the department that provides oversight for the policy in question.

If you are unsure who to speak with, contact your HR team in the first instance who can advise.

Remember, with any Safety, Health or Environmental concerns, works should be paused, the concern reported immediately to the site management team, and then the concern and rectification recorded through the Observations Process on our online portal.



Speak Up
Tier 3

For more serious matters, the Group's Whistleblowing Policy provides a mechanism by which employees can report concerns about the application of the Code or about business practices more generally, without fear of reprisal or retaliation.

Serious Concerns

- Fraud, theft, bribery, or other corrupt business practices
- Facilitation of tax evasion
- Modern slavery
- Financial accounting or auditing irregularities or misrepresentations
- Criminal or other illegal activity
- The concealment of any of the above

SPEAK UP

If you have any of these concerns, then this must be reported directly and immediately to the GRAHAM Governance team by emailing:

whistleblowing@graham.co.uk

Managers and Supervisors are responsible for escalating any of these concerns immediately to the GRAHAM Governance team to ensure that they are appropriately investigated and addressed.

Speaking up in confidence

Raising a concern or speaking up can take courage, and sometimes what holds us back is a fear of the reaction from our colleagues and managers.

At GRAHAM, we will never retaliate against anyone who, in good faith, raises a concern or participates in an investigation.

Anything you report will be treated in strict confidence and communicated on a need to-know basis. You can raise concerns anonymously if you prefer, although this may make it more difficult for us to fully investigate.

QUESTION
I've witnessed inappropriate behaviour on site but I'm worried if I speak up then I will be labelled a 'snitch' and I'll be mistreated.

ANSWER
It's always right to report any incidence of inappropriate behaviour, to either a manager, FIR Ambassador or HR. GRAHAM doesn't tolerate victimisation and will support staff who seek to ensure we live our values.



Manager Responsibilities

1 Keep an open door

Encourage team members to come to you with questions and concerns. Be available and listen. Help team members make sound work decisions.

2 Escalate concerns

Promptly report any behaviour you suspect is unethical or illegal, violates our Code or policies, or goes against the way we do business. However, you should not investigate the concern yourself.

3 Do not tolerate retaliation

Never retaliate against team members for sharing concerns or asking questions. Always take swift action to protect employees from retaliation by others.

QUESTION

I'm a manager. What should I do if someone on my team comes to me with a question or concern related to the Code?

ANSWER

Listen carefully and give the employee your complete attention. Ask for clarification to make sure you understand the employee's concern. Answer any questions if you can, but do not feel that you must give an immediate response. Seek help if you need it, from another manager, from the GRAHAM HR team or from the Group Governance team.

Even those in leadership roles sometimes need help. If you are not sure of the proper course of action, seek guidance from the GRAHAM HR or Governance teams.

Our values and behaviour

Performance

We are committed to excellence in quality delivery and health & safety




GRAHAM
GRAHAM

Health and Safety

Nothing is more important than the health and safety of everyone who works for, with, or who is affected by our works. We expect all our people to play their part in making our operations safer and free from ill health, ensuring all teams have the right people, equipment, materials, and processes to guarantee a safe and healthy working environment.

We must always:

DO

- Ensure our safety and that of our supply chain partners and those affected by our works.
- Be mindful of, and protect, both the physical and mental health of our colleagues.
- Ensure everyone is competent for the role and tasks they are undertaking.
- Turn up fit for work.
- Monitor compliance with the site rules and adherence to the documented and communicated Safe Systems of Work (SSoW).
- Report any accident, non-injury incident, utility strike or at-risk condition immediately.
- Lead by example.



We must never:



DON'T

- Condone any unsafe act, condition, or behaviour.
- Walk by an unsafe act or work area without pausing the works, making the situation safe, and raising the issue.
- Work in contradiction to the training we have been provided with.
- Apply pressure to our work colleagues to work unsafely.
- Turn up for work or commence any task while under the influence of alcohol or drugs.
- Intentionally falsify any entry in a document required to be kept under legislation.



Our in-house designed SHE reporting and analysis portal allows for timeous reporting of all types of incidents, observations and disciplines across the three strands of SHE.

For further help and guidance, speak with a member of the SHE(Q) team.

Quality Delivery

At GRAHAM, we take great pride in our long-standing reputation of providing the highest quality standards to our customers, colleagues, business partners, suppliers, and the wider communities in which we work.

We work for clients who value our expertise and belief in an ethos of quality, safety, and a technically compliant service, and with a supply chain that shares and signs up to fundamental principles of collaboration, performance, transparency, innovation, and respect.

We must always:

- Follow the approved processes set out in the GRAHAM Quality Management System.
- Adopt a "Right First Time" mindset, with quality at the core of what we do.
- Deliver on and fulfil our obligations.
- Comply with all legal requirements and maintain comprehensive records that adequately demonstrate our quality compliance.
- Ensure our supply chain adhere to our quality expectations.
- Encourage regular customer and stakeholder feedback to help us continually improve our products and services.



We must never:

DON'T

- Ignore customer or stakeholder concerns or complaints.
- Deviate from, or ignore, GRAHAM processes and procedures.
- Fail to report quality concerns to our line manager.



For further help and guidance, speak with your divisional Quality team.

Pause for Quality

Right First Time

Our values and behaviour

Innovation

We are focused on long term sustainability. Business improvement is a constant in driving efficiency and progression





Social Responsibility

At GRAHAM we strive to make a difference. Our impact is measured not just in the quality of the projects we deliver, but the longer-term impact on the communities, people, and environment in which we operate. Our work connects communities, builds a better future, and transforms and maintains the places where we live, work, and relax.

We are proud of the positive impact that we make to the communities in which we work, through the delivery of community benefits and wider social value outcomes. We acknowledge that it is in our best interest, both now and in the long term, to build the skills capacity and resourcefulness of our staff and supply chain through investing in our communities, leaving a lasting legacy, and adding value to our project delivery.



We must always:

DO

- Respect local people and places, by involving and engaging local communities in our works.
- Collaborate with project stakeholders, customers, and impacted communities to help improve and optimise our social impact.
- Keep the communities affected by our projects regularly updated and informed.
- Contribute to social and economic regeneration by employing and nurturing a local committed, skilled, and adaptable workforce.
- Engage with schools, colleges, and universities, as well as charities, to support STEM (science, technology, engineering, and mathematics) learning, enterprise skills and employability.
- Adopt sustainable procurement practices and where possible, purchase local products and services with low embodied impact.
- Support SMEs, Social Enterprises and Supported Businesses to encourage a diverse supply base, ensuring fair payment conditions are applied.
- Promote and procure materials with a preference for recognised responsible sourcing schemes e.g. Fairtrade and ETI certified products.

We must never:

DON'T

- Adopt the attitude that "it's not our problem".
- Refuse to listen to, or not take seriously, the concerns of local stakeholders.
- Disregard the implications of our actions in the community for commercial gain.

For further help and guidance, speak with your divisional Social Value team

Environmental Responsibility

We know that our operations affect the environment in many ways. GRAHAM is committed to preventing environmental harm and having a positive impact on the natural environment by:

- **Achieving Net Zero Carbon Emissions across our direct operations and supply chain by 2045.**
- **Preventing pollution.**
- **Conserving resources and adopting a circular economy approach.**
- **Proactively managing ecological issues and contributing toward biodiversity enhancement.**
- **Adopting a lifecycle approach towards the sourcing of materials in the design and construction of energy efficient buildings and infrastructure.**

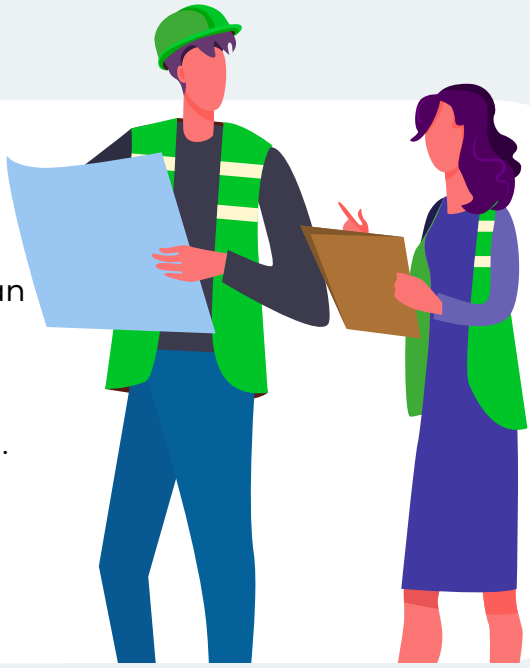
We must always:

DO

- Be aware of the environmental impacts associated with our business and work to minimise these.
- Ensure all environmental incidents and observations are promptly reported so that action can be taken.
- Responsibly manage energy and carbon to assist with global efforts to reduce CO^2 emissions and protect the environment from harm.
- Influence others within our supply chain to adopt low carbon methodologies and deliver improved energy performance.
- Reuse and recycle resources on site, through sustainable management of materials, to reduce and ultimately eliminate waste in construction.
- Minimise our environmental impact through careful and efficient use of resources in all our operations.
- Minimise and conserve natural resources such as energy and water.
- Proactively create, manage, and enhance wildlife habitats and natural landscapes in the areas we work.

We must never:

- Condone any act, condition or behaviour that is likely to result in an environmental incident.
- Ignore the training we have been provided with.
- Fail to report an environmental incident.



DON'T

QUESTION

A supplier is using equipment that appears to have the potential to cause pollution, however they say it would take a week to get a replacement machine, and it could put the delivery of the scheme behind programme. What can we do?

ANSWER

We have little choice. Our commitment to protecting the planet and preventing enforcement action from an environmental regulator is more important than profit or production programmes. We must lead by example and stand them down until they source alternative equipment or develop an alternative method of working.



For further help and guidance, speak with a member of the Environmental Sustainability team.

Our values and behaviour

Respect

We cultivate a culture where everyone feels valued and respected for their contribution




GRAHAM

Fairness, Inclusion and Respect (FIR)

The principles of Fairness, Inclusion and Respect (FIR) help create a positive team culture, a safer and healthier workplace, more innovation through diversity of ideas and a more productive workplace; everything thrives when we feel valued.

GRAHAM is committed to building strong, participative partnerships with the supply chain and our clients to ensure that best practice FIR is a trademark of our delivery at all levels.

We must always:

DO

- Create a workforce where people feel valued and accepted.
- Treat everyone with dignity, fairness, and respect.
- Keep an open mind to new ideas and different points of view. Support and appreciate the unique contribution of others.
- Lead by example and show zero tolerance towards bullying and harassment.
- Speak up and report any incidence of inappropriate behaviour.
- Deliver our services in a way that reflects the diverse needs of the communities we serve.



We must never:

- Treat people unfairly because they are different than us.
- Recruit, reward or promote anyone for any reason other than demonstrable merit.
- Use inappropriate language or behaviours.



QUESTION

I want to boost teamwork and site morale through a team event. We're a mixed bunch of people, how can I make sure everyone is included?

ANSWER

Its great you want to be inclusive. Why not ask everyone to suggest activities you can all do together and get everyone to vote. It's great you want to be inclusive. Why not ask for activity suggestions, then take a vote. That way you'll get buy-in and ideas for future events.



For further help and guidance:

- Speak with our Head of Equality, Diversity and FIR
- Read our Equality, Diversity & FIR Policy

Equal Opportunities and Fair Employment

At GRAHAM we will ensure that we we won't discriminate, directly or indirectly, against any job applicant, employee or third party in matters of recruitment and selection for any position, promotion, training, job transfer or redundancy.

We want to ensure participation from all communities in the workforce. Discrimination on the grounds of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation is not tolerated by GRAHAM.



We must always:

DO

- Seek to attract, develop, and retain a diverse workforce.
- Hire the best candidates for the job based on merit.
- Be aware of and comply with GRAHAM's rules on equal opportunity and fair employment.
- Have a fair system of recognition and reward.
- Seek to give all employees equal opportunity and encouragement to progress within the organisation.
- Ensure our business partners act in a way that is consistent with our standards.

We must never:

DON'T

- Fail to report an incident of non-compliance with company policy in the areas of equal opportunity and fair employment.
- Deny promotion or opportunity on the basis of any form of discrimination.

For further help and guidance, speak with your Human Resources team

QUESTION

I'm divorced and get to see my kids every other week. I asked my manager could I start work 30 mins earlier every other Friday and leave earlier so I can pick them up but was refused. However, I know one of his 'favourites' is allowed flexibility for family matters. It's really unfair!

ANSWER

We encourage flexibility for everyone as long as it doesn't impact operations and managers need to be fair and equitable to everyone. Speak to your manager or HR if you don't feel you can talk to your manager.

Harrassment, Bullying and Discrimination

GRAHAM aims to promote a good and harmonious working environment where every individual is treated with respect and dignity.

Every employee, client, customer, contractor, or visitor to our Company has the right to be treated with dignity and respect. Harassment and bullying whether on grounds of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or any other reason are unacceptable behaviours that are not tolerated by GRAHAM.

We must always:

DO

- Be aware of and comply with GRAHAM's rules on dignity at work.
- Treat everyone with dignity and respect.
- Always communicate and exhibit GRAHAM's values and core behaviours.
- Expect and promote an inclusive workplace.
- Be conscious of how our actions and comments might be perceived or misunderstood by others.
- Discourage harassment and bullying by making it clear that we find such behaviour unacceptable and by supporting colleagues who suffer such treatment and are considering making a complaint.
- Report any incident or potential incident that we become aware of.

We must never:

DON'T

- Retaliate against or victimise any employee involved in the bringing of a complaint of harassment or bullying.
- Work in such a way that your colleagues feel abused, intimidated, or mistreated.
- Condone any form of harassment or abuse from any individual towards another.
- Fail to report an incident relating to harassment, intimidation, or mistreatment.

QUESTION

I have been receiving abusive emails from our client's Project Manager about works on site. It's getting increasingly personal and threatening. It's an important project and we need to keep the Client happy – what do I do?

ANSWER

No one should feel intimidated in their work. You need to report the matter to your manager or to HR who can ensure the behaviour is stopped without impacting any working relationship with the Client.

For further help and guidance, speak with your Human Resources team.



Drugs and Alcohol

GRAHAM has a duty toward, and cares about, the health, safety, and welfare of all employees. The misuse of alcohol, drugs and / or substances can have a detrimental effect upon an individual's health; it can adversely affect their work and their relationships with colleagues and customers; and it can also result in an increased safety risk, absenteeism, and reduced efficiency.

We must always:

DO

- Present ourselves at work in a fit condition to perform our job, free from the influence of alcohol, illegal substances, or the misuse of prescription drugs.
- Take a positive approach to any employee / worker seeking support in overcoming alcohol and / or drug related problems (provided that these problems are raised prior to testing).
- Record in our Site Induction, or disclose to HR, details of any medication prescribed to us, and notify us if this is changed or added to by a registered medical practitioner, to allow GRAHAM to comply with their legal duty to provide an appropriate level of first aid should the need arise.
- Investigate any instances of drug or alcohol misuse in breach of this Code and take suitable action, in line with company policy.



We must never:

DON'T

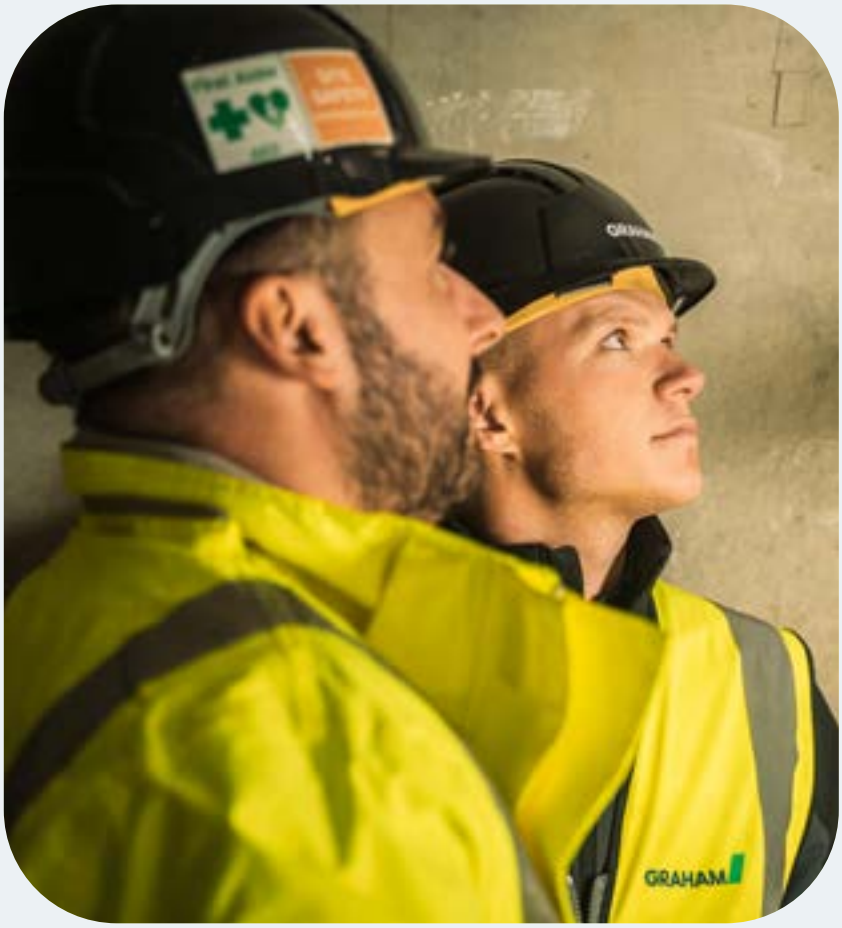
- Tolerate the misuse of drugs or alcohol by any members of our teams during working hours.
- Condone, recommend, or encourage the consumption of alcohol outside of prescribed safe limits.

QUESTION

I have recently been prescribed new medication or have had my medication changed by my GP or registered health practitioner. What do I have to do?

ANSWER

Our rules require any employee or supply chain partner's operatives to advise your HR team (employee) or the Project Site Management team (supply chain partner operatives) of changes to medication or the starting of new medication. Some medication may require a change of role or change of duties based on advice from a GRAHAM-appointed independent Occupational Health Professional.



For further help and guidance:

- Speak with a member of the SHE(Q) Team
- Read our Alcohol, Drug & Substance Abuse Policy

Human Rights and Modern Slavery

GRAHAM has a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We respect and protect human rights. At GRAHAM we ensure we do not exploit anyone; we uphold the rights of all those who work for or with us, and of the communities in which we operate. This means refusing to do business with any individual, company or organisation that fails to uphold the standards and principles of basic human rights.

We must always:

DO

- Follow the requirements of GRAHAM's Anti-Slavery and Human Trafficking Policy.
- Support the principles of the Modern Slavery Act 2015.
- Support all the principles set out in the United Nations Universal Declaration of Human Rights.
- Comply with national legal requirements regarding wages and working hours.

We must never:

DON'T

- Agree to do business with any individual, company or organisation that fails to uphold the standards and principles of basic human rights or contradicts our policy or breaches the Act.
- Fail to report a breach or suspected breach of the GRAHAM Anti-Slavery and Human Trafficking Policy.

For further help and guidance:

- Speak with a member of the SHE(Q) Team
- Read our Anti-Slavery & Human Trafficking Policy


GRAHAM

Our values and behaviour

Transparency

We are open and honest, and we value the integrity of our business. Each of us is accountable for maintaining our standard





Bribery and Corruption

We will not engage in any form of bribery or corruption. We must never offer or accept anything improper to secure or facilitate business, whether directly, through our supply chain, or any third party.

Bribery and corruption come in many forms, and they are not always obvious. A gift, the promise of a job, the offer of a trip, a charitable contribution – all could be considered bribes, if offered in exchange for any decision or preferential treatment.

The consequences for giving or accepting a bribe can be severe for GRAHAM and you as an individual.

We must always:

- Act with honesty and integrity, avoiding even the appearance of any wrongdoing.
- Make sure our business partners embody our high standards.
- Use company funds lawfully, ethically, and for proper business purposes only.
- Report any potential corruption, attempts to bribe us, or solicit bribes from us.



QUESTION
A senior employee at a client asks you to arrange a job for his daughter, in return for which they will make sure the next contract goes our way. Can you agree?

ANSWER
No. Bribes can take many forms and this form of favour could potentially amount to a bribe.

We must never:



DON'T

- Offer or accept anything of value to improperly influence a business decision.
- Participate in any form of corrupt behaviour.
- Engage in facilitation payments to win business.
- Use our influence unethically to obtain services from supply chain partners.
- Conceal or fail to record accurately and completely the true nature of our activities.



For further help and guidance read our Anti-Bribery Policy or speak with a member of our Legal or Governance teams.

Gifts and Hospitality

GRAHAM does not prohibit the giving or receiving of gifts or hospitality, designed to cement business relationships. However, any gifts or hospitality we give or accept should always be customary and reasonable in terms of value, frequency, and timing.

Excessive or inappropriate gifts or hospitality can tarnish our reputation for fair dealing and may even break the law.

You should use your judgement to assess if the gift or hospitality offered or being offered is appropriate. If you are struggling to justify a gift or hospitality, it's probably not okay.

We must always:

DO

- Make sure there is a legitimate business reason for accepting or offering the gift.
- Use our best judgement when deciding to offer or receive gifts or hospitality. If it feels wrong, it probably is.
- Ensure any gifts or hospitality offered, received, or declined are recorded on our GRAHAM Gifts and Hospitality Register.
- Report any form of unreasonable or lavish gift or entertainment offered to or requested from us.



We must never:

DON'T

- Offer gifts or hospitality in an attempt to secure or maintain business.
- Offer or accept gifts of cash or cash equivalent (e.g. vouchers).
- Offer or accept gifts or hospitality if we think it will impair objective judgement, inappropriately influence a decision, create a sense of obligation, or be open to misinterpretation.
- Conceal any offer or acceptance of gifts and hospitality.

Sometimes, you may not be sure if a gift is excessive or not, so as a guide:

When it is ok	When it is not okay
An offer to go to lunch with a new client / supplier	An extravagant meal for your whole family, paid for by a supplier / client not in attendance.
A gift bag at a supplier's conference filled with snacks and branded stationery	A gift basket filled with an expensive electronic fitness tracker, among other items, sent to you by a supplier.
An offer to have a drink with a supplier	A case of fine wine
A small desk clock with a supplier's logo	An expensive watch
A golf outing and lunch at a local course with a supplier / customer.	Airfare and accommodation at a sporting event

For further help and guidance, read our Gifts and Hospitality Policy

Fraud, Deception and Dishonesty

GRAHAM has a zero-tolerance policy towards fraud, deception or dishonesty of any kind.

We are committed to acting fairly, honestly, and openly in all our dealings. We comply with all relevant legislation and uphold the highest standards of integrity and propriety in our business activities. We will not defraud or deceive anyone, act dishonestly or misuse company property or resources.

Types of Fraud



Bid rigging: Suppliers in the market colluding to fix prices or direct customers to use certain contractors.



Billing fraud: Purposely overstating the amount of labour, materials and other equipment required to complete a project.



Fictitious vendors: Created by falsifying payment applications, covering up the purchase of personal items or diverting money to a phantom company.



Theft or substitution of materials: Taking materials form the work site for personal use or subcontractors / suppliers using lower-grade material than quoted.



False representation: This might involve using undocumented workers, falsifying reports, test results or insurance certificates, or non-compliance with environmental regulations.



Fuel card abuse: Using company issued fuel cards for personal vehicles or sharing with unauthorised individuals (e.g., colleagues, friends, family).



Timesheet and expense claim abuse: Worker submitting false expense, overtime, or timesheet claims.

We must always:

DO

- Act honestly, fairly, and openly.
- Make sure our business records are accurate, complete, not misleading and comply with our contractual obligations.
- Carefully check or inspect things that are our responsibility.
- Base all invoices on clear and complete information and check they comply with contractual arrangements.
- Take great care when spending the company's money or making financial commitments on its behalf.
- Follow the requirements of GRAHAM's Fraud, Corruption and Bribery Prevention Procedures.

We must never:

DON'T

- Falsify our company expenses or claim from the company for expenses that have not been properly incurred in carrying out company business.
- Knowingly inflate invoices to our clients with unentitled costs.
- Use the company's money or resources for non-work-related activities or an improper purpose.
- Ignore something that we suspect might involve fraud, theft, deception, or dishonesty.
- Conceal or destroy any documents or records that are subject to an investigation or may be used in an official proceeding.
- Make false claims.

For further help and guidance, read our Fraud & Corruption Prevention Policy or speak with a member of our Legal or Governance teams.

Money Laundering

Money laundering is a process where funds generated through criminal activity (such as terrorism, drug dealing, tax evasion, human trafficking, and fraud) are moved through legitimate businesses to hide their criminal origin.

Money laundering may occur when a third party passes criminal property to GRAHAM. This might be a payment from a client, materials from a supplier or other goods. It is therefore important that we know about the full identity and character of our clients, suppliers and other third parties that we deal with.

We must always:

DO

- Do all that we reasonably can to ensure that we only deal with people and organisations of sound integrity.
- Know our clients and suppliers by undertaking due diligence in accordance with our IMS procedures.
- Be proactive when it comes to spotting financial transactions that might signal a problem.
- Report your concern if you see or suspect an activity or transaction that is outside of normal process.

We must never:

DON'T

- Engage in any money laundering or terrorist financing activities or assist any other party in doing so.
- Allow deals that are too good to be true to proceed without undertaking appropriate investigation.
- Accept cash payments.

For further help and guidance, speak with a member of our Legal or Governance teams.


GRAHAM

Tax Evasion

Tax evasion is where there is a deliberate attempt not to pay tax which is due. It is against the law, and it deprives our communities of essential funds needed for effective public services.

At GRAHAM, we take our social and economic responsibilities seriously and pay the correct amount of tax when it is due; we expect the same of the businesses and people we engage with. We must never engage in tax evasion or help anyone else to do so.



DO

We must always:

- Act honestly and openly.
- Report any incident or potential incident relating to tax evasion.
- Fairly disclose and pay all our tax liabilities.

We must never:

DON'T

- Engage in tax evasion.
- "Turn a blind eye" to others seeking to evade tax.
- Assist anyone else to engage in tax evasion.



Red Flags

1. A customer or supplier requests for payments to be:
   - made in cash
   - paid to or through another business
   - paid to bank accounts in another country
   - paid in another currency
2. A supplier has deliberately failed to register for or failed to account for VAT.
3. An employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions.
4. A supplier trying to conceal the true source country of goods to evade Customs duties.
5. paid in advance where that is not accepted practice for that to occur.



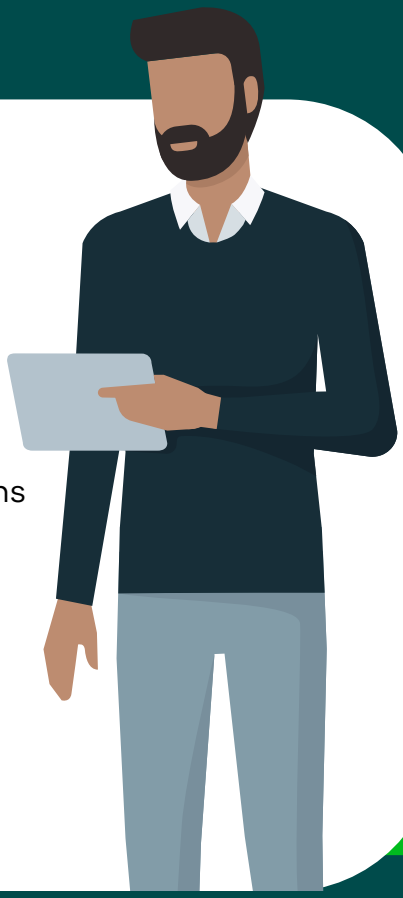
For further help and guidance:

- Speak with a member of the Group Tax team
- Read our Preventing Facilitation of Tax Evasion Policy

Competition Law Compliance

We want to work in marketplaces that are fair, open and honest and want our competitors, customers and suppliers to know this is how we will always behave. We comply with competition and anti-trust laws wherever we do business.

We must always:



DO

- Follow the requirements of GRAHAM's Competition Law Compliance Policy.
- Take care when dealing with competitors to avoid competition concerns.
- Report any suspicions or allegations of possible anti-competitive behaviour.
- Notify Head of Legal Services immediately if we receive confidential information that we should not have obtained e.g., a competitor's tender information.

We must never:

DON'T

- Exchange non-public or other sensitive information with competitors or other parties as it can give the appearance of an inappropriate agreement or understanding.
- Attempt to set or fix prices with competitors.

For further help and guidance:

- Speak with a member of the Legal team
- Read our Competition Law Compliance Policy



Conflicts of Interest

We respect our employees' right to privacy in their personal activities; however, employees must not have personal interests which conflict with those of GRAHAM.

Conflicts of interest can arise when activities outside of work, ownership interests in other companies, or personal relationships interfere (or appear to interfere) with our ability to do our jobs or to make unbiased decisions on behalf of GRAHAM.

Even the appearance of a conflict of interest can make others think we are acting improperly and should be avoided.

We must always:

DO

- Avoid a situation where our personal interests, or those of our family and friends, may influence a business decision.
- Avoid supervising or taking part in the hiring or promoting of a family member.
- Avoid holding a position with access to or influence over performance appraisals, salary information or other confidential information related to a family member.
- Avoid any outside business activity that is in competition with GRAHAM or makes use of company assets.
- Avoid any outside employment or activity that calls into question your ability to devote appropriate time and attention to your responsibilities within GRAHAM.
- Report any form of, or potential form of, conflict of interest to your line manager.
- Declare any interests you have in other organisations (commercial, charitable, or political) by completing our 'Declaration of Interest Form'.

We must never:

DON'T

- Use our position, contacts or any knowledge gained at GRAHAM for personal gain or to benefit family or friends.
- Employ, attempt to employ, or have other business dealings with a family relative or close friend, unless it has first been approved by Human Resources.
- Do anything that might create the impression that customers or suppliers have a contact in GRAHAM who can exert influence on their behalf.
- Conceal any (real or perceived) conflict of interest.

QUESTION

I am aware that we are looking for a new supplier for a particular material. My brother works for one of the companies that we will be approaching for a quote. What should I do?

ANSWER

You should not provide any confidential information to your brother regarding the tender process, and you should make sure you are not involved in the procurement decision to avoid any accusation that you may have unfairly influenced the decision. You should also have made your line manager aware and in line with our Conflict of Interest Policy, declared this relationship via the GRAHAM Declaration of Interest Form.



For further help and guidance:

- Speak with a member of the Governance team
- Read our Conflict of Interest Policy

Data Protection and Privacy

GRAHAM handles personal and confidential information relating to our people and our clients on a daily basis; we are committed to ensuring this information remains secure at all times.

Failure to keep this information secure may result in prosecution, significant fines, and reputational damage.

We must always:



DO

- Follow the requirements of GRAHAM's Data Protection Policy.
- Only use personal information for business purposes and in accordance with the law.
- Ensure personal information remains secure at all times.
- Ensure that arrangements are in place to comply with data protection legislation.
- Report any data protection breaches immediately, in accordance with our Data Protection Policy.

We must never:

DON'T

- Leave sensitive information lying around or unsecured, or otherwise fail to take care of it.
- Release or divulge personal information relating to our people, clients, or members of the public to third parties other than in accordance with the law.
- Try and gain a commercial advantage by using commercially sensitive and / or confidential information which is not publicly available.
- Check references for job applicants without first obtaining consent.
- Provide commercially sensitive and / or confidential information externally.



For further help and guidance, speak with a member of the Legal team or read our Data Protection Policy

Information Management and Security

Effective information management and security is a team effort involving the participation and support of every GRAHAM employee and affiliate who deals with information and/or information systems.

We must always:

DO

- Follow all information security and acceptable use policies, including the GRAHAM IT Acceptable Use Policy.
- Know how to report an information security incident.
- Understand the value and sensitivity of our information or our customers' information.
- Maintain a copy of information for no longer than is required for contractual, legal, commercial, or legislative reasons.
- Take proper precautions to protect company computer systems and company information against loss, damage, or theft.
- Make sure we minimise the risk of information being lost when transferring data between devices.
- Ensure all IT equipment, software, or information in electronic or paper form, is returned when no longer required.
- Promptly report any loss of laptop or memory stick containing company owned information.

QUESTION

"I am going out straight after work. Can I leave my laptop in the boot of the car?"

ANSWER

As per the IT Acceptable Use Policy, "Portable computers and electronic devices must not be left in vehicles after 9.00 pm or overnight, nor should they be left overnight in any office, under any circumstances."

We must never:

DON'T

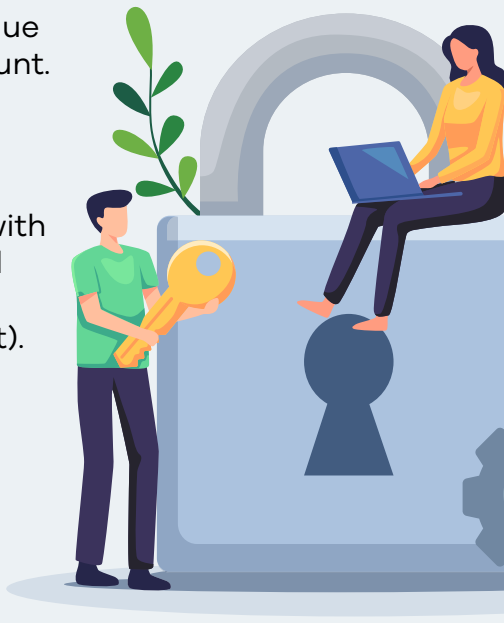
- Reveal confidential information about GRAHAM in a personal online posting, upload, or transmission.
- Try to circumnavigate IT security controls on IT equipment belonging to GRAHAM or our customers.
- Share any information held by GRAHAM unless we are authorised to do so, and recipients are authorised to receive it.
- Leave valuable information unattended or unsecured, including sensitive paperwork or portable equipment such as laptops or tablets.
- Use company computer systems to access, obtain, create, or distribute any material that's illegal or offensive or that's been obtained illegally.
- Use unsecure technologies and methods when exchanging confidential information.
- Open unsolicited attachments or click on links from non-verified sources.

QUESTION

"I have a login account to a third-party application. My colleague needs to see information stored on it but doesn't have an account. Is it OK to give them my login details?"

ANSWER

NO – usernames, passwords/passcodes should not be shared with anyone else (including family members). Your colleague should request an account, or the information should be retrieved and passed to them (provided they have the rights to view/receive it).



For further help and guidance:

- Speak with a member of the IT team
- Read our IT Acceptable Use Policy

Political Donations and Contributions

GRAHAM acknowledges that employees have a right to their own political views and may participate in politics in a personal capacity, contributing at their own expense to political parties, candidates or causes.

GRAHAM is politically neutral and under no circumstances may GRAHAM funds, facilities, or other resources be used for political activities or contributions.

We must always:

DO

- Make it clear that our political views and actions are our own, and not those of GRAHAM.
- Follow all GRAHAM policies that involve working with government, including our Anti-Bribery Policy.
- Make sure of our facts and have appropriate approvals when talking with governments and public bodies.

We must never:

DON'T

- Make any donations to a political party on behalf of GRAHAM.
- Use GRAHAM time or resources for personal political activities.
- Engage in political activity or lobbying on behalf of GRAHAM unless we have been authorised by the Chief Executive Officer to do so.




GRAHAM
INVESTORS IN PEOPLE

Charity Donations and Sponsorships

At GRAHAM, we want to have a positive and lasting impact on the communities we live and work in. We actively participate in local communities and charitable activities and encourage our employees to do the same.

When acting on behalf of GRAHAM, we must be mindful of our responsibilities. We must only make charitable contributions or sponsorships for bona fide charitable purposes and where the activities are aligned with our business objectives, values, and ethical principles.

Charitable contributions or sponsorships should be given with the expectation that no benefit is received or expected. They should never be used as a substitute for political contributions.

Of course, you have every right as an individual to make personal donations to charity and participate in charitable activities for any causes you believe in. All we ask is that in these circumstances, it is clear that you are acting in a personal capacity.



We must always:

DO

- Complete a 'Charitable Donation and Sponsorship Request Form' prior to committing GRAHAM resources to any charitable donations or sponsorships.
- Ensure employee volunteering activities are in line with the GRAHAM Employee Volunteering Policy.
- Record all charitable donations, contributions, or sponsorships within our Charitable Donations and Sponsorship Request Form.
- Check for potential conflicts of interest.



We must never:

DON'T

- Make charitable donations or sponsorships without appropriate approval.
- Offer or make a charitable contribution as an incentive or reward for obtaining or retaining business.
- Contribute to a charity unless we are sure the charity is bona fide and has all appropriate registrations.
- Offer sponsorship without checking it is suitable and appropriately administered.
- Use charitable donations as a substitute for political payments.

For further help and guidance, read our Charitable Donations and Sponsorship Policy

Using Company Assets



Physical and Financial

Property, Company Vans, Company Cars, Office Equipment and Supplies, Materials, Cash and Cash Equivalents



Intellectual Property and Information

Company Data, Internally developed technology, Ideas or Concepts, Strategic Business Plans, Customer Lists, Financial Information



Technology

Laptops, Mobile Devices, Internet Access, Networks, Hardware, Software and Solutions



Intangible

Reputation, Brand, Stakeholder Relationships

We must always:

DO

- Treat company property with respect and use assets and resources appropriately.
- Take great care when spending money on the company's behalf.
- Avoid excessive waste and look for more efficient ways of allocating resources.
- Manage intellectual property, including rights, patents, and know-how, effectively.
- Consider potential disruption to our operations and put plans in place to mitigate this should it occur.
- Take personal responsibility for security and challenge and report anything we believe compromises security.

We must never:

DON'T

- Condone theft, misappropriation or improper use of company assets or property.
- Use the company's property for personal use beyond the limits allowed in our policies.
- Misrepresent or abuse expenses or claim for sums not spent on legitimate company business.
- Assume security is someone else's responsibility.
- Fail to report damage to company assets in a timely manner and in accordance with relevant company policy.

QUESTION
Can I use my GRAHAM issued technology for personal use?

ANSWER
As per the IT Acceptable Use Policy, GRAHAM IT Assets are provided to conduct Company business. Occasional personal use is permitted, however personal information should not be stored, nor personal applications installed.

What misuse of company assets might look like:

1. A GRAHAM employee purchasing excessive amounts of materials or equipment with a view to utilising on non-work related jobs or projects.
2. A GRAHAM employee selling excess material, equipment, or scrap through a private transaction.
3. GRAHAM staff using unauthorised Company trade accounts to avail of preferential rates for personal supplies.
4. GRAHAM staff using company vehicles and company provided tools and equipment to perform side jobs out of hours or at weekends.

Proper Business Records

At GRAHAM, we must ensure that we report openly and honestly on our business performance. Falsifying or intentionally misstating any records, be they expenses, timesheets, operational compliance key performance indicators, supplier invoices, company accounts or any other documentation is fraudulent. It could have a significant impact on GRAHAM's reputation and may result in incorrect business decisions being made.

We must always:

DO

- Accurately and fairly report all business transactions and performance metrics.
- Maintain effective and accurate records to support our reporting requirements.
- Complete all expense claims in line with the GRAHAM Expense Policy and ensure the expenses of our teams are accurate.
- Complete all timesheets accurately and honestly and ensure the timesheets of our teams are accurate.
- Maintain records in accordance with contractual and legal requirements.

We must never:

DON'T

- Knowingly record or report any transaction in an ambiguous or misleading way.
- Falsify any documentation.
- Apply influence on others to falsify documentation, undertake misleading or false accounting or reporting.
- Remove or destroy documentation in an attempt to conceal or mislead.



Communications

Our communications with the outside world (to include clients, potential clients, the media, supply chain and potential future employees) must be clear, truthful and build on our core values.

Only specifically authorised people should communicate externally on any business matter. Any media statements issued on behalf of or by GRAHAM shall be issued by the GRAHAM Marketing and Communications team.

Internal communication is equally important, as it helps to create a knowledge sharing culture across GRAHAM, where we learn from one another and harness our collective strengths. It communicates our unique story as an organisation, while representing every individual within the company – cementing our culture, identity, and perception.

We must always:

DO

- Comply with GRAHAM's Communication and Public Relations Engagement Policy and the requirements of this Code.
- Consult the Marketing & Communications team if we are approached to make comments or act as a spokesperson for GRAHAM.
- Be aware of any situation where we may be seen to be making statements on behalf of GRAHAM.
- Comply with GRAHAM's Social Media Policy and the requirements of this Code.
- Follow GRAHAM Brand Guidelines when using the GRAHAM logo or creating any collateral.
- Ensure communications or publications are approved by the Marketing & Communications team before external release.
- Make sure any communication (internal or external) will not impact GRAHAM's reputation.

We must never:

DON'T

- Make or provide any statement regarding GRAHAM unless we are authorised to do so.
- Respond to any questions from the media without consultation with the GRAHAM Marketing & Communications team.
- Write or say anything that may damage GRAHAM's reputation or the reputation of our clients.
- Post information relating to GRAHAM on our own social media channels, unless we are sharing it from an official GRAHAM social media account.

QUESTION

You have been asked by a local newspaper to provide a comment on behalf of GRAHAM. What should you do?

ANSWER

Direct the newspaper contact to your point of contact in the Marketing and Communications team, letting them know that all opinion and comment from GRAHAM will be considered and issued by your colleague. This ensures that all communication has a positive impact on the reputation of GRAHAM and that of our clients.



For further help and guidance read our Communications and Public Relations Engagement Policy

Our values and behaviour

Collaboration

We are open and honest, and we value the integrity of our business. Each of us is accountable for maintaining our standard




GRAHAM

Collaboration

GRAHAM prides itself on its collaborative approach, which is underpinned by the company values of Performance, Transparency, Collaboration, Innovation and Respect. It is the GRAHAM Way to work with our colleagues, clients, and key stakeholders to deliver value and meet all objectives.

Every GRAHAM employee is an ambassador, not just for the Company but also for each other. We expect everyone to adhere to the Group's core values, by fully contributing to and participating in the work of each internal division and for the overall good and benefit of all other divisions, and so ultimately for the good and benefit of the entire GRAHAM business.

We must always:

DO

- Promote a positive, collaborative and inclusive working environment within GRAHAM.
- Communicate transparently, regularly and effectively with colleagues, management and other stakeholders.
- Share information with colleagues to maximise business efficiencies and ensure continuous improvement.
- Adopt an ethos of collaboration and continuous business improvement to deliver a positive legacy for communities in which we live and work.

We must never:

DON'T

- Discourage or inhibit intra-division / department collaboration.




GRAHAM

Relationships with Suppliers

We believe that working closely with our supply chain is critical to our ability to deliver. We are committed to working in genuine collaboration with our supply chain and seek to develop strong relationships with our supply chain partners to ensure experienced teams with the right skills and capability help us deliver high-quality, cost-effective solutions for our clients.

We have in place a preferred suppliers list that has been selected on the basis of their quality, health and safety, competency, expertise, reliability, accuracy, attention to detail and competitiveness.

We must always:

- Make sure all suppliers are engaged via a fair, transparent and objective process.
- Help our suppliers to understand the "GRAHAM Way" of working.
- Regularly assess the performance of suppliers and contractors to ensure they comply with this Code, our policy, and legislative requirements.
- Avoid conflicts of interest by maintaining an arms-length relationship.
- Report any concerns related to the activities of suppliers to our line manager.



We must never:

DON'T

- Overlook real or suspected supply chain underperformance.
- Accept lavish gifts or hospitality from a supplier.
- Conceal any conflict of interest with a supplier.
- Share confidential information between supply chain partners / clients unless protected through a formal non-disclosure agreement.
- Engage supply chain without due process and adherence to GRAHAM policies.



For further help and guidance, read our Supply Chain Policy

Relationships with Stakeholders and Other Third Parties

We want to be trusted by our stakeholders and other third parties. Our stakeholders include, but are not limited to, our colleagues, customers, partners, suppliers, consultants, advisors, subcontractors and the communities where we work.

Relationships with any of our stakeholders need to be honest, transparent, professional and be conducted with integrity. This will help our stakeholders to trust us and have confidence in our business.

We must always:

DO

- Strive to develop and maintain robust and long-lasting relationships.
- Be fair, transparent, and trustworthy in our dealings with others.
- Select people and organisations based on a fair and objective process with clear expectations of what is required.
- Work with stakeholders to resolve issues at the earliest stage.
- Always communicate honestly and appropriately.



We must never:

DON'T

- Knowingly neglect or breach contractual agreements.
- Act unprofessionally, dishonestly, or unfairly.
- Ignore stakeholder feedback or fail to act on it.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GRAHAM

The GRAHAM Way

Our Code of Conduct

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County Down
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