

Code of Responsible Business Conduct

Introduction:

Soilfix's mission is *to understand & manage risk in the ground* – in doing so we endeavour to create better places, deliver safer environments, improve people's wellbeing, and safeguard the environment. Integral to achieving this mission is to work under a Code of Responsible Conduct, that applies to all Soilfix Directors, Managers, temporary / permanent staff, sub-contractors, consultants and professional service providers.

This Code of Conduct is fully aligned with our Core Values, namely **Loyalty & Integrity, Versatility & Resilience, Self-Development** and a **'Win Win' Mindset**.

We are committed to plan, organise and innovate to deliver the best outcomes for Soilfix, our customers, supply chain and the environment in a responsible manner, whilst complying with applicable laws and UK regulations.

Health, Safety & Wellbeing:

Soilfix takes the health, safety and wellbeing of its employees and people working and visiting our sites and offices very seriously. We are committed to achieving the highest standards of health, safety and wellbeing across our business, and have devised our own site safety initiative - 'SafeGround'.

Soilfix implements rigorous health and safety procedures, providing our employees and other staff with Personal Protective Equipment (PPE), adequate information, training and equipment. We ensure that our employees hold the appropriate qualifications, training and knowledge to be fully competent and safe, and provide an appropriate number of competent supervisors.

Health & Safety incidents / accidents / best practices are reported using our online reporting tool, which ensures that corrective actions are closed out and trends collated for continual improvement. We encourage all staff to raise any health, safety and wellbeing feedback or concerns they may have, and have mental health First Aiders on hand to discuss any mental health issues our staff may be experiencing in a confidential manner and safe space. Issues can be raised directly with line management or via our Health & Safety committee which is made up of staff from multi-disciplines with a range of experience.

In line with our Harassment & Anti-bullying Policy, we are committed to creating a work environment where people behave professionally, and everyone is treated with dignity and respect. Any form of harassment, bullying, verbal or physical abuse will not be tolerated.

In line with our Drugs & Alcohol Policy, we prohibit the unlawful use, consumption, possession, distribution and sale of drugs and/or alcohol, both at the workplace or when conducting company business.

Social Responsibility:

Soilfix is committed to respecting and safeguarding the human rights of all our colleagues and is an Equal Opportunities employer who values diversity and equality in employment. We select and promote employees based on their aptitudes and abilities, not their sex, sexual orientation, marital status, race, nationality, religion, ethnic or national origin, age or disability.

As a minimum, Soilfix comply with all relevant legislation for employment, benchmark industry working hours, Real Living Wage and other benefits. We recognise and respect employees right to freedom of association and collective bargaining.

We also manage our business in a manner consistent with the principles set out in the Modern Slavery Act 2015 – refer to our Modern Slavery Policy.

In line with our Bribery & Corruption Policy, we strive to comply with the UK Bribery Act 2010 and take care to ensure that gifts and hospitality we receive are within reasonable limits and never allow them to influence our decisions. We comply with all applicable tax laws in accordance with our Anti-Tax Evasion Statement.

We strive to operate and carry out our duties conscientiously, including actively avoiding any potential conflicts of interest, and require the same of our supply chain partners. In addition, Soilfix competes and negotiates for business with its clients and suppliers in an ethical manner where openness, professionalism and honesty are applied to all our dealings.

Community Involvement:

We take pride in our work and meet all defined regulatory and contractual standards. Where they fall short of these requirements, we rectify the issues in a timely manner and continually learn from these occurrences.

We strive to represent our client's business and their values in all situations, acting with integrity and with respect for the local community.

Soilfix supports skills and capacity building through initiatives such as graduate trainee recruitment and apprenticeships, training and education. We offer appropriate and effective trade mentoring, coaching and support to our apprentices, graduates and trainees to support their ongoing learning and professional development.

Information Security:

In accordance with our Data Protection Policy, we fully commit to never use or disclose any information belonging to our clients, their representatives, or other stakeholders, except as required by them. We will not act on confidential information received in error from our clients, their representatives, or others. We will ensure that all uses of personal data take place in accordance with applicable laws and regulations. No third-party data will be disclosed to any third party without prior written consent, other than as required by any Regulator or court of law.

We make appropriate procedural, technical and organisational security measures to prevent unlawful disclosure, unauthorized processing or accidental loss, destruction, damage or alteration of our client's personal data and other confidential information.

Environmental Responsibility:

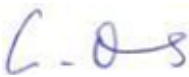
In accordance with our Environmental Policy, we conduct our operations in an environmentally responsible manner and in accordance with applicable environmental laws. We make all reasonable measures to mitigate any adverse impacts that our remediation contracting services may have on the environment and maintain strict procedures for minimising any environmental risks on our sites.

We are committed to supporting our clients to monitor, quantify and report Greenhouse Gas (GHG) emissions while taking strong, proactive measures to reduce them. This is achieved through use of our bespoke Project 'Carbon Calculator' Tool, which can be used to measure predicted vs actual GHG Emissions, as well as facilitate 'Optioneering' assessments to confirm the benefit of using green fuels and alternative, more sustainable, lower-carbon techniques to meet the project requirements.

We are committed to helping our clients meet their ambition to delivery biodiversity net gain targets in line with the Environment Act 2021. We strive to be careful and considerate of our actions, working to minimise the impact on local flora, green spaces and wildlife. Our Site Teams can identify ecological issues including protected species, nesting birds, invasive plants, etc. Potential issues and/or breaches of planning conditions are reported immediately.

In respect of materials and waste, we are committed to reducing our impact on natural resources through the efficient use of materials and reducing waste. We follow the Waste Hierarchy and adopt good practice standards for maximising re-use/recycling of construction, demolition and excavation materials, segregating waste at source and storing wastes responsibly.

All Soilfix staff and subcontractors will be encouraged and supported to adopt working practices in accordance with this Code.

Signed:
Director**Date:** 15th March 2023