



**CIVIL
CONNECT**
PLC

Supply Chain Code of Conduct

September 2025

Introduction

Civil Connect PLC is committed to conducting its business with the highest standards of integrity, ethics, and social responsibility. Our reputation is built on the trust of our clients, the quality of our work, and the principles by which we operate. We expect the same unwavering commitment from our entire supply chain.

This Supply Chain Code of Conduct outlines the minimum standards of behaviour and practice we require from all our suppliers, subcontractors, and partners. Adherence to this Code is a prerequisite for doing business with Civil Connect PLC. It is designed to ensure our collective operations are lawful, ethical, and protective of people and the environment.

Our supply chain is an extension of our business and a reflection of our values. We are dedicated to working with partners who share our commitment to ethical conduct and corporate responsibility. This Code is the foundation of that partnership.

Ramon Bell

Chairperson of Civil Connect PLC

1. General Provisions

This Code applies to all organisations that provide goods or services to Civil Connect PLC. Suppliers are responsible for ensuring their employees, sub-suppliers, and subcontractors also adhere to these standards. We reserve the right to verify compliance with this Code through audits and assessments.

Legal & Ethical Conduct

2. Competition Law Code of Conduct

All suppliers must conduct their business in full compliance with applicable competition and antitrust laws. Any form of anti-competitive behaviour, including price-fixing, bid-rigging, market sharing, or the exchange of sensitive competitive information, is strictly prohibited.

3. Anti-Bribery Code of Conduct

Civil Connect PLC has a zero-tolerance approach to bribery and corruption. Suppliers must not offer, promise, give, request, or accept any bribe, kickback, or other undue advantage to obtain or retain business. This applies to dealings with public officials and private sector individuals. All activities must comply with the UK Bribery Act 2010.

4. Criminal Corporate Offences Code of Conduct

We are committed to preventing the facilitation of tax evasion. Suppliers must not engage in, or facilitate, any form of tax evasion or fraudulent activity. Suppliers are required to have reasonable procedures in place to prevent their employees and associates from facilitating tax evasion, in line with the Criminal Finances Act 2017.

People & Labour Standards

5. HMRC - Off Payroll Working Rules Code of Conduct

Suppliers are responsible for correctly determining the employment status of their workers and contractors for tax purposes, in accordance with HMRC's off-payroll working rules (IR35). All required income tax and National Insurance contributions must be correctly processed and paid.

6. Right to Work and Modern Slavery Code of Conduct

Suppliers must ensure that all their employees have a verified legal right to work in the UK. We have a zero-tolerance policy towards modern slavery and human trafficking. Suppliers must comply with the Modern Slavery Act 2015, ensuring their operations and supply chains are free from forced labour, child labour, and any form of human exploitation.

7. Whistleblowing Code of Conduct

We encourage an environment of transparency and accountability. Suppliers should have a whistleblowing procedure that allows their employees to report concerns about wrongdoing, unethical conduct, or breaches of this Code without fear of retaliation. Any concerns related to Civil Connect PLC can be reported to our designated compliance officer.

Data, Dignity & Safety

8. Data Protection Code of Conduct

Suppliers must handle all personal and confidential data in accordance with the UK GDPR and the Data Protection Act 2018. Appropriate technical and organisational measures must be in place to ensure the security and confidentiality of any data shared by or processed on behalf of Civil Connect PLC.

9. IT Code of Conduct

Suppliers granted access to Civil Connect PLC's IT systems or data must use them responsibly and solely for legitimate business purposes. Unauthorised access, sharing of credentials, or misuse of IT resources is strictly forbidden. Suppliers must maintain robust cybersecurity measures to protect against data breaches.

10. Dignity at Work Code of Conduct

We expect our suppliers to foster a workplace that is free from harassment, bullying, discrimination, and victimisation. All individuals must be treated with dignity and respect, regardless of their background or personal characteristics.

Ethics & Safeguarding

11. Safeguarding Code of Conduct

The welfare and protection of children and vulnerable adults is paramount. Suppliers working on sites or in environments where they may come into contact with vulnerable individuals must have robust safeguarding policies and procedures in place to prevent harm and abuse.

12. Code of Ethics

Suppliers must operate with the highest level of business integrity. This includes:

- **Conflicts of Interest:** Disclosing any actual or potential conflicts of interest to Civil Connect PLC immediately.
- **Gifts and Hospitality:** The offering or acceptance of gifts, hospitality, or entertainment must be reasonable, infrequent, and transparent, and must not create any sense of obligation or improper influence.
- **Environmental Responsibility:** Complying with all applicable environmental laws and regulations, and demonstrating a commitment to minimising environmental impact.

Statement Approval

This Supply Chain Code of Conduct has been approved by the Board of Directors of Civil Connect PLC.

Ramon Bell

Chairperson

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