

CODE OF CONDUCT

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DATE POLICY REVIEWED	June 2026
BOARD SIGN OFF STATUS	APPROVED

1. INTRODUCTION

At LPL Construction Services, we strive to foster mutually beneficial partnerships with our employees while upholding the highest standards of ethics and social responsibility. Our commitment to ethical business practices extends beyond our own operations to include our suppliers. We believe that a strong employee and supplier code of conduct is essential to ensure fairness, respect, and protection of human rights. This code outlines our expectations regarding the rights to property or land, self-determination, and safety and security to the wider LPL community and a commitment to equal pay for equal work irrespective of gender or other characteristics.

We recognise and respect the rights of our employees and suppliers to their property and land. This includes their right to own, use, and transfer property without coercion or infringement. We expect our suppliers to comply with all applicable laws and regulations governing property rights and to engage in fair and transparent business practices.

LPL employees and suppliers must operate strictly based on the merits of their products and services and in line with LPL Construction Services policies and processes. We must never offer, promise, authorise, or provide, directly or indirectly, anything of value (including, without limitation, business gifts or courtesies) with the intent or effect of inducing anyone (including, without limitation, our customers, employees, or business relationships). These obligations reflect the Bribery Act 2010 and our Anti-Corruption and Bribery Policy.

LPL employees and suppliers must not engage in any illegal anti-competitive conduct or deceptive trade practice for any reason whatsoever. LPL employees and suppliers must never rig bids, fix prices, or provide or exchange customers or clients competitively sensitive information (including, without limitation, price, cost, and technical data) with LPL's competitors. Suppliers must also refrain from abusing their market power for the

benefit of them or others. LPL requests all employee and suppliers deal fairly, honestly and in confidence.

LPL employees and suppliers must avoid all conflicts of interest or situations giving appearance of conflict when doing business. All actual or potential conflicts must be reported promptly. LPL suppliers must report conflicts to the LPL Procurement Manager and all LPL employees to report to Compliance Director.

2. RIGHTS TO SELF-DETERMINATION

We value the autonomy and self-determination of our suppliers and respect their right to freely operate their business, make decisions, and pursue their own economic growth. We expect our employees to support our suppliers to uphold these principles and act with integrity and transparency.

Our expectation is LPL, and its suppliers provide fair and equitable treatment to all, ensuring freedom of association and the right to collective bargaining. In addition

- LPL suppliers must follow all UK laws and be committed to the value of respect to all workers, including without limitation to temporary, students, contract direct employees and their subcontractors.
- LPL will not engage or condone unlawful employment or exploitation of children and child labour. LPL suppliers must ensure they are combatting the potential for exploitation throughout its supply chain.
- Our employees and suppliers will respect free choice of all persons and strictly prohibit forced or compulsory labour. Human trafficking and slavery must be eradicated to support voluntary labour ethos, consistent with the Modern Slavery Act 2015.
- Suppliers and employees will always, respect the right to security, protecting employees from physical, verbal, or psychological harm.
- LPL employees and our suppliers must strive to maintain an inclusive workplace free from harassment and discrimination. LPL requires all suppliers to follow the policies and practices in place to foster an open environment to provide freedom against prejudice and offer equal pay for equal work.
- Suppliers should establish clear policies and procedures to address complaints and ensure confidential reporting mechanisms are available for those who experience infringements on their rights.
- LPL employees please familiarise yourself with 7.5 Complaints Process and 5.2 Whistle Blowing Policy.

3. RIGHTS TO SAFETY AND SECURITY

LPL prioritises the safety and security of all individuals within our business community. This includes providing a safe working environment that mitigates risks, prevents accidents, and promotes employee well-being.

- We expect our suppliers to comply with all applicable health and safety laws, regulations, and standards. Safety training, proper protective equipment, and adequate emergency response protocols should be provided to all workers.

- LPL suppliers and employees must follow all applicable data protection, privacy and information security laws and be committed to respecting and protecting privacy.
- We all must only collect information related to business purpose specific to the business-related activity to which you are engaged. Data should only be held for as long as necessary to fulfil the business connection. We all must destroy personal information in a manner that limits the risk of loss, theft, misuse, or unauthorised access and in accordance with the LPL Document Retention Schedule (7.5).

4. CONCLUSION

LPL continue to strive to treat all employees fairly and with respect. LPL ensure 100% of its employees are paid more than the minimum wage criteria and also more than the voluntary, Real London Living Wage. Through the development of our pre-qualification process, our suppliers are also required to commit to fair pay for all. Suppliers failing to meet this requirement may not be permitted access onto the LPL Approved Supplier List.

By adhering to this code of conduct, LPL Construction Services can promote a sustainable and responsible business ecosystem while respecting the rights and well-being of individuals within our business and supply chain. Our commitment to these principles strengthens our reputation as a trusted partner and reflects our dedication to upholding the highest ethical standards and environmental standards.

LPL Construction Services reserves the right to investigate and take appropriate action in cases when these guidelines are violated by any suppliers. We encourage open communication and collaboration with our suppliers to continuously improve and ensure compliance with these principles.