



## Code of Conduct

**Durkin and Sons is committed to high standards of integrity and sustainability. Durkin has a 'zero tolerance' policy when it comes to unethical business behaviour, such as bribery and corruption. We expect all of our suppliers to adhere to similar standards and to conduct their business ethically. Durkin and its suppliers must comply with all applicable laws and regulations, the requirements set out in this Code of Conduct and contractual obligations placed on us.**

**This Durkin Code of Conduct defines the main principles underlying our business activities and our suppliers.**

### **Human rights**

Durkin and Sons shall

- respect the personal dignity, privacy and rights of each individual;
- refuse to make any person work against his or her will; and
- not tolerate behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### **Fair labour conditions and child labour**

We shall ensure fair labour conditions. In particular, we will

- refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;
- respect the rights of employees to freely associate and bargain collectively;
- not tolerate or use child labour in any stage of our activities other than in accordance with all applicable laws and regulations;
- not use any forced labour or involuntary prison labour and allow all employees the choice to leave their employment freely upon reasonable notice;
- compensate employees fairly and follow local wage regulations and / or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs;
- ensure that working hours, including overtime, do not exceed applicable legal limits, and where such limits do not exist, we recommend that working hours not exceed sixty hours per week including overtime; and
- ensure that employees are allowed at least one uninterrupted day off per week.

### **Health, safety and environmental management**

We shall provide a safe and healthy workplace for all of our employees and shall conduct our business in an environmentally sustainable way. In particular, we will

- formally appoint a competent person to manage health, safety and environmental programs and improvements;



- establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks; and
- ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

### **Business ethics**

We shall conduct our business in an ethical manner. In particular, we will

- refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including Durkin employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- adhere to anti-trust and other competition laws;
- disclose to our Clients information regarding potential conflicts of interest relating to our activities on their behalf, including disclosure of any financial interest a Durkin employee may hold in a Clients or suppliers business;
- protect all confidential information provided by our Clients and our respective business partners;
- respect intellectual property of others, including Clients; and
- adhere to international trade regulations and export control regulations.

### **Secure business**

We shall conduct our business in a secure manner. In particular, we will

- implement reasonable measures for minimising exposure of our Clients, our business and our suppliers to security threats such as terrorism, crime, pandemics and natural disasters; and
- when visiting or working at Client and Durkin locations, abide by both Clients and Durkin security procedures and report any security concerns to the appropriate authority.

### **Procurement by suppliers**

We shall procure goods and services in a responsible manner. In particular, we will

- select suppliers providing goods or services directly or indirectly to Durkin based on them agreeing to adhere to standards comparable to those set forth in this Code of Conduct; and
- when working at Durkin offices and sites, suppliers will only subcontract work with prior consent from Durkin and Sons.

### **Inspections and corrective actions**

In order to ensure and demonstrate compliance with the Durkin Code of Conduct, we shall

- keep record of all relevant documentation, and provide to our Clients supporting documentation upon request.
- To verify compliance, we reserve the right to audit and inspect our suppliers operations and facilities, at our own cost and upon reasonable notice, with or



without support of a third party. If the results of such an audit or inspection cause us to be of the opinion that our suppliers do not comply with this Code of Conduct, we shall take necessary corrective actions in a timely manner, as directed by us.

- If a supplier fails to comply with this Code of Conduct, then we may take action against them, including suspending or terminating their activities as one of our suppliers.

### **Rights to speak out**

In the context of our business relationship with our Clients and suppliers, if they or our employees believe that the terms of this Code of Conduct are not adhered to, or that Durkin and Sons is not acting in accordance with its own Code of Conduct, then we encourage everyone to raise their concerns via company reporting channels.

Signed

A handwritten signature in black ink, appearing to read "M. Durkin", enclosed within a large, loopy oval shape.

Michael Durkin, Managing Director

Date  
1<sup>st</sup> July 2022

Review by date  
30<sup>th</sup> June 2023