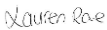








CODE OF CONDUCT

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02 Inclusion of Dress Code

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1.0 PURPOSE

The purpose of this policy is to establish the standards of behaviour expected by all employees and contractors at Ponticelli UK Ltd. This policy promotes a work environment that is respectful, professional, and compliant with all applicable laws and regulations.

While employed by Ponticelli UK Ltd, every employee is representing the Company, whether on a formal or informal basis, and is expected to adhere to this Code of Conduct and our core Values: HSEQ, Wisdom, People, Integrity & Performance.

2.0 SCOPE

This policy applies to all Ponticelli employees on United Kingdom ('UK') terms and conditions. It covers conduct in the workplace, during work-related activities, and when representing the Company.

Suppliers, subcontractors and other contracting parties of Ponticelli UK Ltd are expected to adhere to standards which are consistent with Ponticelli UK Ltd's Code of Conduct. Ponticelli UK Ltd shall do its best to ensure such adherence.

This policy does not form part of any employee's Contract of Employment, and it may be amended and updated at any time.

3.0 CORE PRINCIPLES

Integrity: Employees must act with honesty and integrity in all interactions and decisions.

People: Employees must treat colleagues, clients, and stakeholders with respect and dignity.

Wisdom: Employees must comply with all applicable laws, regulations and Company policies.

Confidentiality: Employees must protect the confidentiality of Company information and not disclose it without proper authorisation.

Performance: Employees are responsible for their actions and must report any unethical or illegal behaviour.

4.0 RESPONSIBILITIES

4.1 EMPLOYEES:

Employees are responsible for:

- Adhering to this policy
- Behaving appropriately in the workplace
- Raising any concerns to their Line Manager if they observe, or have evidence of, inappropriate behaviour
- Being aware of how their behaviour affects people with whom they work and eliminating behaviour (including teasing and joking) that a reasonable person would find threatening, hostile, or offensive
- Treating others with courtesy and resolving differences in a non-abusive and non-threatening manner

- Preventing actual or implied violent behaviour at work
- Declaring personal relationships at work

4.2 LINE MANAGERS:

Line Managers are responsible for:

- The behaviour of employees under their supervision
- Ensuring the fair application of this policy and that all individual employees are aware of and comply with this policy
- Acting promptly when matters arise and taking corrective measures
- Seeking advice from HR in a timely manner
- Ensuring and maintaining a safe and secure environment
- Maintaining confidentiality, where appropriate
- Setting an example through their own good behaviour and conduct.

4.3 HR:

HR are responsible for:

- Providing the necessary support and guidance for all staff, including Line Managers.
- Ensuring the fair and consistent application of this policy.

5.0 PERSONAL CONDUCT

While most of the time employees will be representing the organisation during working hours or at company/client functions, it must also be recognised that even outside normal working hours, employees have a responsibility not to take the reputation of the organisation into disrepute by inappropriate behaviour, e.g. divulging sensitive business information.

All Employees are expected to conduct themselves in an appropriate professional manner whilst representing the Company, and this is particularly relevant where employees are working away on business or have been posted overseas.

Listed below are examples of behaviour deemed to be unacceptable. This list is not exhaustive and is intended for indication purposes only:

- Treating others in a discourteous manner;
- Bullying, harassment or victimisation of others;
- Divulging sensitive information to a third party;
- Fighting with or assaulting others;
- Threatening or intimidating others;
- Using profanity or abusive language;
- Stealing, destroying, defacing or misusing Company property;
- Gambling on Company property;
- Failure to observe local customs while working overseas/away from home;
- Slander of the Company;
- Excessive use of alcohol or under the influence of drugs or other substances while representing the Company, including attendance at training courses;
- Consuming alcohol 24 hours prior to check-in;
- Wearing clothing inappropriate for the work being performed;
- Failing to maintain cleanliness and order in the workplace, or of Company property, e.g., Company vehicles, accommodation, etc.

The Company will fully investigate any complaints of inappropriate behaviour and employees found to have behaved inappropriately may be subject to disciplinary action, up to and including dismissal in line with the PUK-HR-MAN-0003 Disciplinary Policy.

6.0 ANTI-DISCRIMINATION, ANTI-HARASSMENT & ANTI-VIOLENCE

Ponticelli UK Ltd is committed to providing a work environment free from discrimination, harassment, threats and acts of violence, or any other disruptive behaviour.

In keeping with this commitment, Ponticelli UK Ltd has established a zero-tolerance policy that prohibits actual or threatened violence by employee, harassment or discrimination against co-workers, visitors, or other persons who have contact with employees in the course of their duties. Further details can be found within the PUK-HR-MAN-0004 Bullying & Harassment Policy.

Violence or the threat of violence will be regarded as an act of real and serious danger. Employees who violate this policy will be removed from the premises and subject to disciplinary action, up to and including dismissal, in line with the PUK-HR-MAN-0003 Disciplinary Policy. In addition, the individual may be subject to criminal penalties as well as personal legal action. Ponticelli UK Ltd may assist law enforcement in any criminal investigation.

7.0 PERSONAL RELATIONSHIPS AT WORK

Ponticelli UK Ltd recognises that from time to time, personal relationships may exist or develop between work colleagues. They may arise at any time during the course of an individual's employment, as well as exist prior to joining Ponticelli UK Ltd.

While Ponticelli UK Ltd does not wish to encourage or interfere with these personal relationships, it is necessary to ensure that all Ponticelli UK Ltd employees behave in an appropriate and professional manner whilst at work. It is imperative that all staff ensure that their conduct is not called into question in performing their professional duties.

The following principles apply to all employees regardless of their job or level of seniority to ensure they are not open to allegations such as impropriety, bias, abuse of authority, or conflicts of interest:

- A personal relationship in itself will not advantage or disadvantage any employee.
- It is the responsibility of employees to decide whether a personal relationship exists and if so, declare to their line manager or HR any personal relationships, which may give rise to a conflict of interest, or any workplace advantage perceived or otherwise. Where this is unclear, employees are encouraged to discuss this with their line manager or HR in the first instance.
- Managers are responsible for dealing with these matters sensitively and effectively and should take all reasonable steps to avoid actual and perceived conflicts of interest. Managers are expected to maintain confidentiality, where appropriate, and should not disclose any information about personal relationships without first informing the employee concerned. Advice should be sought from HR as necessary.

- Intimate behaviour during work time, for example kissing or holding hands, is expressly prohibited. This rule applies during all working time, whether at the normal workplace, on clients' premises or elsewhere. Any breach of this rule will be regarded as a serious disciplinary offence leading to disciplinary action up to and including dismissal in line with the PUK-HR-MAN-0003 Disciplinary Policy.
- In order to avoid a situation where there may be a conflict of interest, Ponticelli UK Ltd reserves the right to take preventive measures as it deems appropriate such as transferring one or both of the employees involved in the relationship to a job in another department/location. In these circumstances, Ponticelli UK Ltd will consult with the staff and seek to reach a satisfactory agreement regarding the transfer of one or both of them.
- If an employee is aware that a candidate whom they have a personal relationship with is applying to work for Ponticelli UK Ltd, it is their responsibility to inform them of the principles of this policy and to ensure that their manager or HR is made aware of the likely application.
- Anyone who is involved in a selection process (shortlisting or interviewing) and is aware that a candidate whom they have a personal relationship with, or indeed any other person that they know personally, has applied, they should declare this to the HR at the earliest opportunity. Steps will be taken to ensure that the process is conducted fairly and equitably, thus protecting the manager concerned, the candidate and Ponticelli UK Ltd from any allegations that personal relationships influenced the end result.

8.0 DRESS CODE

At Ponticelli UK Ltd, we strive to maintain a professional and welcoming environment. Our dress code is designed to reflect the Company's image and to ensure a respectful and inclusive workplace.

All employees are expected to adhere to the following guidelines:

- **General Appearance:** Employees should maintain a neat, clean, and professional appearance at all times during working hours.
- **Business Attire:** Office Environment: Business casual attire is the standard dress code. This includes; trousers, skirts, dress shirts, blouses, polo-tops and dresses. Shorts, tank tops, flip-flops and any clothing with offensive or inappropriate language or graphics is deemed unacceptable.
- **Casual Office Days:** On Fridays, in the Company office, more relaxed attire is permitted, including jeans and casual tops. However, clothing should still be neat, clean and appropriate for a professional setting.
- **Offshore / Site:** Employees working in roles that require specific attire for safety or functionality must adhere to the dress code specified for those roles, including any personal protective equipment (PPE) requirements.
- **Footwear:** Appropriate footwear should be worn at all times. This means no flip-flops, slippers or excessively casual shoes unless explicitly allowed on casual days or within specific work areas where different standards apply.

- **Grooming & Personal Hygiene:** Employees are expected to maintain good personal hygiene and grooming.
- **Exceptions:** Any exception to the dress code for medical, religious or cultural reasons should be discussed with HR to ensure appropriate accommodations are made.

9.0 BRIBERY & CORRUPTION

Ponticelli UK Ltd is committed to the highest standards of ethical conduct and integrity in its business activities. The Company prohibits any provision or offering or accepting of bribes of any variety to any person, whether private or public.

Employees must not (neither directly or indirectly through a third party) offer anything of value to influence the actions or decisions of any official, other person in public or legal duty, any person acting on behalf of customers or subcontractors / suppliers, or to any other third party, or to otherwise obtain any improper advantage, in selling goods and services, conducting financial transactions, or representing Ponticelli UK Ltd's interests.

Further information in relation to the Company's policy and position on preventing and prohibiting bribery and corruption can be found in PUK-HR-MAN-0009 Anti-Bribery & Corruption Policy.

10.0 CONFLICT OF INTEREST

A conflict of interest occurs when personal relationships, participation in external activities or interest in another venture can influence or could be perceived to influence decisions of the employee whilst acting in their capacity as a Ponticelli UK Ltd employee.

It is employee's responsibility to always avoid conflict of interest and act in the best interests of Ponticelli UK Ltd, taking steps to avoid situations or positions that may create or appear to create conflicts of interest.

Any conflict of interest must be disclosed to the appropriate Line Manager or HR.

11.0 REPORTING VIOLATIONS

Employees are encouraged to report any violations of this Code of Conduct to their Line Manager, HR department, or via the Company's PUK-HR-MAN-0013 Whistleblowing Policy.

Retaliation against employees who report violations in good faith is strictly prohibited as detailed within the PUK-HR-MAN-0010 Anti-Retaliation Policy.

12.0 BREACHES OF THIS POLICY

Breaches of this policy may result in disciplinary action, up to and including dismissal, in line with the PUK-HR-MAN-0003 Disciplinary Policy.

The severity of the disciplinary action will be determined based on the nature and circumstances of the violation.

13.0 REFERENCES

- PUK-HR-MAN-0003 Disciplinary Policy
- PUK-HR-MAN-0029 Equal Opportunities
- PUK-HR-MAN-0004 Bullying & Harassment Policy
- PUK-HR-MAN-0013 Whistleblowing Policy
- PUK-HR-MAN-0010 Anti-Retaliation Policy
- PUK-HR-MAN-0009 Anti-Bribery & Corruption Policy
- GRP-SUP-RSE-172 Ponticelli Freres Group Ethical Code of Conduct