



# GALLAWAY CONSTRUCTION LIMITED

## BUSINESS CODE OF CONDUCT

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# Gallaway Construction Limited Business Code of Conduct



Document Author	Document Reviewer	Document Approver
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## Revisions Control

Revision Record			Review & Approval		
Revision	Issue Date	Description	Owner	Reviewed	Approved
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A 01	06-03-19	Issued for Implementation	JM	SR	IP
A01	11-01-21	Reviewed for continuing suitability	JM	SR	IP
A01	14-01-22	Reviewed for continuing suitability	JM	SR	IP

- 1.0) Revisions for review will be issued as R01, with subsequent issues as R02, R03 as required.
- 2.0) Revisions approved for Implementation/Design Issue/Engineering will be issued as A01 with subsequent issues as A02, A03 as required.
- 3.0) Revisions "Approved for Construction" (AFC)/Purchase will be issued as C01 with subsequent issues as C02, C03 as required.
- 4.0) Sections revised from previous issues shall be highlighted in the right-hand margin using the appropriate revision status, e.g. A02
- 5.0) All revisions to the document must be approved by the Owner.

## Review and Approval

The Gallaway Construction Limited "Business Code of Conduct" policy is reviewed and updated on an annual basis to ensure its continuous suitability and effectiveness. The policy will also be reviewed and updated whenever major changes are introduced, e.g. changes in legislation, work scope or Company organization or structure.

This Gallaway Construction Limited "Business Code of Conduct" policy has been reviewed and approved by the Managing Director.

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## 1.0 MESSAGE FROM THE MANAGING DIRECTOR

Welcome to our Business Code of Conduct (the Code). It has been designed to help every one of us make the right decisions and remain true to Gallaway's Core Values and Business Principles. The core values and principles detailed below in this code of conduct are at the very heart of our company. They are not optional and everyone who represents Gallaway in any capacity is expected to comply with them fully.

Whether you are a manager, an employee, consultant, or contractor, I encourage you to read and use our Code of Conduct to ensure that you are doing your part to sustain an ethical culture and protect the future of Gallaway.

A personal commitment to ethics and compliance is something over which we all have absolute control. Anything less than 100% compliance undermines our commitment to excellence, our principles, and our reputation. By following this Code, you are helping to make Gallaway trustworthy, reliable, and sincere.

Thank you for your commitment to compliance.

*Ian Preston*

**Ian Preston**  
**Managing Director**



# Gallaway Construction Limited

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## 2.0 INTRODUCTION

### 2.1 Purpose

This Code of Conduct governs how Gallaway conducts its business affairs throughout all aspects, activities, and operations. Gallaway is committed to complying with all applicable UK and international legislation and all ethical and conduct standards outlined in this code wherever we operate. This Code describes the behaviour expected of our employees, contract staff, and service providers, and how they relate to our Business Principles and Core Values.

### 2.2 Scope

This Code applies to all employees, managers, and directors, all consultants, contract staff, contractors, and service providers or any agent working for, or in the name of, Gallaway Construction Limited (The Company). They shall be made aware of this Business Code of Conduct and shall be required to act consistently within the Code when acting on behalf of the Company

### 2.3 Compliance and Breaches of The Code

Gallaway has a policy of zero tolerance for breaches of the Business Code of Conduct. Any such breaches will be taken very seriously and may result in disciplinary action up to and including dismissal.

### 2.4 Questions and Raising of Concerns

If you have any questions about the application of the Code or the proper course of action under the Code, you should consult your line manager. If you know or suspect any breaches, or potential breaches of the Code you have a duty to report it. If you do not report it, you risk the reputation of Gallaway, and the possibility of financial penalties being applied against the Company.

No retaliation or reprisal against any person reporting a breach, or potential breach, of the code will be tolerated by the Company and any such retaliation or reprisal will be investigated and appropriate action taken where applicable.

Gallaway maintains a "[Whistle Blower Policy](#)" which outlines the procedures for anyone who wishes to report a breach or potential breach of the Code and details the protection and confidentiality afforded to that person.

## 3.0 CORPORATE RESPONSIBILITY, CORE VALUES, BUSINESS PRINCIPLES

### 3.1 Corporate Responsibility

At Gallaway we share a set of core values of honesty, integrity, and respect for people. By making a commitment to these in our working lives, each of us plays our part in protecting and enhancing Gallaway's reputation. Our shared core values underpin all the work we do and they are the foundation of our Code of Conduct which govern how we conduct our affairs and outlines our responsibilities to our employees customers, contractors, suppliers, business partners, stakeholders, and the community. We recognise our corporate responsibility and the impacts that we have on society and the economy and this is reflected in our [Corporate Social Responsibility Policy](#). This Business Code of Conduct describes the behaviour that Gallaway expects of you and what you can expect from Gallaway.

### 3.2 Vision

Our Corporate Vision is: To excel in design management and construction that is tailored to our customers key requirements and to be the trusted choice for clients and candidates engaged in the construction industry. Trust must be earned through a combination of a strong mutual relationship, consistently high standards of workmanship and delivery, regular and open communication, honesty, and integrity.

In order, to achieve our vision the fundamentals core values detailed below must be in place throughout all our operations.

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### 3.3 Values

At Gallaway we are passionate about our business and results and we operate by the 12 core values listed below:

- Safety - never compromised.
- Honesty - at all times
- Integrity - throughout all aspects of our business
- Respect - to all parties and stakeholders
- Accountability - for all our actions
- Transparency - through all of our dealings and contracts
- Humility - throughout every sphere of our operations
- Passionate - strong belief and care in what we do
- Innovative - forward thinking, pioneering
- Simplistic - employing value engineering where possible
- Pragmatic - problem solving in a realistic way
- Committed - we say what we do, and we do what we say

### 3.4 Stakeholder Commitments

The following principles guide our relationships with our stakeholders:

- **Clients and/or Customers**  
We are committed to understanding and focusing upon our clients' needs and delivering high quality, reliable, innovative, compliant, and safe services which meet or exceed their expectations.
- **Staff**  
We are committed to hiring, retaining, and developing a high-quality workforce within a safe work environment enriched by diversity and characterised by open communication, honesty, trust, respect, and fair treatment.
- **Communities**  
We will obey all applicable by laws and national legislation and respect all local and national cultures. We will maintain the highest standards of integrity and ethics and conduct our operations in a safe and environmentally responsible manner.
- **Contractors, Suppliers, Service Providers**  
We are committed to building balanced long-term relationships with our contractors, suppliers and service providers based on mutual benefit, transparency, respect, and our Code of Conduct.

### 3.5 Responsibilities

Everyone who is engaged by the Company is responsible for their own behaviour and must ensure that they conduct themselves in a manner which does not reflect in a negative way on Gallaway. As a condition of employment, or contract of services, all employee's or consultant's personal responsibilities include:

- Complying with all applicable laws and regulations
- Complying with all applicable Company policies
- Maintaining appropriate and ethical behaviour
- Ensure that subcontractors are aware of our Business Code of Conduct which is also included on our website.
- Reporting any suspected misconduct, illegal activity, fraud, abuse of company assets or other violation of the Business Code of Conduct

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### 4.0 PEOPLE, BEHAVIOUR, CULTURES, AND DIVERSITY

#### 4.1 Health, Safety and Security

Nothing we do is so important that we cannot take the time to do it safely. We all have a responsibility to work safely and to protect ourselves, others around us, and the environment. Everyone has the right to cease work at any time if health and safety is compromised.

We regard the management of health and safety as an integral part of our business and as a management priority. As defined within our [Health and Safety Policy](#), all activities will be carried out in a safe manner and we will ensure the health, safety and welfare of our employees and others who may be affected by our activities.

We work in conjunction with our clients to ensure the safety and well-being of all personnel on site. We ensure all our employees, contract staff, and Gallaway subcontractors are made aware of and are instructed and contractually bound to follow all applicable site safety rules, policies, and codes of practice.

Our [Drugs and Alcohol Policy](#) is strictly enforced to ensure a drug and alcohol-free workplace so that we can work safely, effectively, and productively. The use of illegal drugs or the inappropriate use of legal drugs or alcohol is not permitted while on Company business in any capacity.

We maintain a reporting system for incidents, accidents and any concerns regarding health, safety, or security through the Company procedure for [Reporting and Recording of Accidents and Dangerous Occurrences](#). All such reports are investigated, and appropriate action taken whether that be action to eliminate. All such reports are investigated, and appropriate action taken whether that be action to eliminate or minimise risk or to assist in our lessons learnt process and our endeavours for continuous improvement. We also promote the reporting of hazards, near misses and positive intervention incidents.

Security of assets and intellectual property is a continuing challenge that must be addressed on a daily basis. Employees, managers, directors, contract staff, services providers, consultants and subcontractors engaged by Gallaway must remain vigilant at all times and aware of the possibility of theft or fraud. With the proliferation of social media within the past few years it is essential that everyone remains alert to the possibility of fraud through the electronic media as detailed in our [Social Media Policy](#).

#### 4.2 Environment

We are committed to providing a quality service in a manner that minimises our potential impact on the environment. Consideration of relevant environmental concerns and impacts are included in our decision making and activities.

We operate in compliance with all relevant environmental legislation and we strive to use environmental best practices in all we do.

Waste is minimised through re-use, recycling and efficient use of non-renewables where possible and practical. We promote environmental awareness among our employees and encourage them to work in an environmentally responsible manner.

Our commitment to our environmental responsibilities is further detailed within our Company [Environmental Management Plan](#) and our [Environmental Policy Statement](#).

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### 4.3 People

We are proud that Gallaway employees and contract staff come from different countries, backgrounds, and cultures. We value the diversity of our people and respect and uphold their right to work in a safe and healthy environment with mutual respect and open communication, free from harassment and offering equal opportunity for career development.

Realising the full potential of Gallaway staff through individual and collective development is a shared responsibility across the Company and its businesses operations and is under pinned annual staff performance appraisals and by our training programme, which is available to all staff, our [Training and Development Policy](#)

We treat others with courtesy, respect and fairness, accepting differences in cultural and ethnic backgrounds and observe the highest standards of courtesy and respect when interacting with each other. We engage with our staff and involve and consult with them in improving performance and implementing our business strategies as detailed in our [Communication Policy](#) and [Communication Matrix](#).

We encourage open and honest communication with and between staff members. All input is welcome, advice is freely given, and issues are raised and shared candidly. In this way concerns can be resolved quickly and business issues can be proactively addressed.

We are committed to providing a work environment free from harassment on the grounds of gender, colour, race, political beliefs, religion, ethnic or national origin, age, disability, sexual orientation, gender reassignment, or any other basis.

### 4.4 Human Rights

Conducting our activities in a way that respects human rights is a business imperative for Gallaway as detailed in our [Modern Slavery Policy](#). Human rights requirements are embedded in our existing framework, manuals and policies and include:

- **Human Resources.**  
Our policies and standards help us establish fair practices and a positive work environment.
- **Security.**  
Company-wide security requirements help keep staff, contractors, and facilities safe in a way that respects human rights and the security of local communities
- **Contracting and Procurement.**  
We seek to work with contractors and suppliers who contribute to sustainable development and are economically, environmentally and socially responsible which is outlined in our [Purchasing Procedure](#)

We comply with applicable laws and regulations, including the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. We also regularly engage with our external stakeholders and always strive to contribute, both directly and indirectly, to the general wellbeing of the communities in which we operate.

### 4.5 Harassment

Gallaway will not tolerate harassment. We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. We shall treat others with respect and avoid situations that may be perceived as inappropriate. Feedback, comment, criticism, or challenges must always be delivered in an appropriate and respectful manner and with respect and regard to cultural sensitivities – what is acceptable in one culture may not be in another. It is important to be aware of and understand these differences. This commitment is supported by our [Workplace Harassment Policy and Procedures](#). Violence or aggressive or threatening behaviour, shall not be tolerated.



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### 4.6 Equal Opportunity and Diversity

We are an equal opportunity employer and therefore treat everyone equally irrespective of gender, colour, race, political beliefs, religion, ethnic or national origin, age, disability, or sexual orientation, gender reassignment, membership or non-membership of a trade union, spent convictions or any other grounds for discrimination provided by UK law.

Permanent and temporary staff employment, evaluation, transfer/reassignment, development, promotion, compensation, and termination decisions are based on skills and performance and not on any unlawful considerations.

We embrace diversity and seek to promote the benefits of diversity in all of our business activities and our business culture reflects that belief. We strive to ensure that the media in which we recruit is wide enough to support as diverse an employee and consultant base as possible.

Our [Equality and Diversity Policy](#) is displayed on the Gallaway website and is regularly reviewed to ensure that it remains current with all applicable legislation.

### 5.0 COMPLIANCE

#### 5.1 Bribery and Corruption

We are committed to a zero tolerance of bribery and corruption. This commitment extends to all the Company's business dealings and transactions in all our areas of operation. For the avoidance of any doubt, staff and consultants must never offer, give, or accept a bribe or be involved in any other improper or illegal conduct, whilst acting on behalf of the Company. Gallaway "zero tolerance" policy is detailed in the Company [Anti-bribery Policy](#) programme which is regularly reviewed to capture any changes in law, reputation demands and changes in the business.

#### 5.2 Gifts and Hospitality

Gallaway is determined and unwavering in its commitment to maintain its reputation. All staff are always encouraged to act in the most appropriate manner and to do the right thing.

Gallaway discourages all staff from accepting any form of gifts and/or hospitality from clients, contractors, suppliers, or business partners. Minor gifts offered at Christmas as a thanks for good service may be accepted, provided that the value is not considered excessive, and they are declared for inclusion on the Corporate Gift Receipt Register. Any breach of this Company policy may result in disciplinary action.

#### 5.3 Conflicts of Interest (COI)

A Conflict of Interest (COI) may arise when your personal relationships, participation in external activities, or an interest in another business or venture, could influence, or be perceived by others to influence, your business decisions for Gallaway.

You must not let any decisions you make at Gallaway be influenced by personal considerations such as relationships or outside interests of yourself, family, or friends.

If you have an actual, potential, or perceived COI, you must protect yourself from any suspicion of misconduct by being transparent and declaring this to your line manager.

Provided that no actual, potential, or perceived COI could result, you may acquire interests in other businesses and perform external professional activities in your own time.

You are also entitled to be active in your own time in community, government, educational and other non-profit organisations. However, in any such case, you must comply with all relevant laws, regulations, and Gallaway's policies. If there is any doubt, you must raise your concern with your line manager.

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### 5.4 Data Privacy and Protection

At Gallaway we are committed to respecting the confidentiality of our staff members' and contract staff and candidates' personal information. It is our policy to acquire and retain only personal data that is required for the effective operation of the group or that is required by law. The Company "[Data Breach Policy](#)" defines our commitment to the protection of all personal data collected by the Company in line with our [GDPR Policy](#).

Access to personal data is limited to personnel who have the appropriate authorisation or a valid business reason. Use of personal data is restricted to the purpose for which it was collected, and the data is only held for as long as necessary to meet the legal or business reason for which it was collected. Gallaway also extend this privacy to job applicants via the [GDPR Privacy Notice to Applicants](#) which is available on the website.

Gallaway is committed to compliance with all applicable aspects of the General Data Protection Regulations (GDPR) 2018.

### 5.5 Data, Records, Reporting and Accounting

We are committed to honest, accurate, complete, reliable and objective recording and reporting of information, whether financial or non-financial. This commitment is essential for our credibility and reputation, meeting legal and regulatory obligations, meeting our commitments to our stakeholders, and informing and supporting our business decisions and actions.

Our Financial data conforms with generally accepted accounting principles and Gallaway reporting policies. Other data shall be accurate and complete.

We maintain proper internal controls to ensure truthful, accurate, complete, transparent, timely, and understandable financial and management reports. Documents and records are retained in accordance with all applicable laws and regulations on record retention.

### 5.6 Anti-Money Laundering

Money laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities, including terrorism. All companies are at risk of being used or exploited in this way. It is imperative that everyone must be on their guard to help protect the reputation of Gallaway and to ensure we comply with all applicable UK and international legislation.

To ensure that Gallaway is protected from the possibility of any breaches of anti-money laundering law:

- You must not knowingly deal with criminals, suspected criminals, or the proceeds of crime.
- You must follow any due diligence requirement specified by Gallaway so that we know who we are doing business with.
- You must ensure that your business transactions on behalf of Gallaway do not involve acquiring, using, or holding monetary proceeds or property acquired with the proceeds of crime.
- You must not hide the origin or nature of criminal property.
- You must not facilitate the acquiring, ownership, or control of criminal property.
- If you have knowledge or suspicion that a counterparty is involved in money laundering in connection with its transaction with Gallaway, you must report it immediately to your line manager.

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### 5.7 Antitrust

Antitrust laws protect free enterprise and fair competition. Supporting these principles is important to Gallaway, not just because it is the law, but because it is what we believe in and it effects our reputation.

We expect all Gallaway staff to play their part in combating illegal practices. These include price-fixing, market sharing, output limitation or bid-rigging, and anticompetitive or monopoly practices. All staff must be vigilant in not entering into any kind of inappropriate conversation or agreement with our competitors.

### 6.0 BUSINESS PARTNERS

Our business partners are the clients, consultants, contractors, suppliers, agents, joint venture or alliance partners and others with whom we transact business. Business relationships founded on trust, respect, transparency, and mutual benefit are essential if we are to deliver our vision and commitments to our stakeholders.

#### 6.1 Clients

We understand and focus upon our clients' needs, delivering consistent, high quality, reliable, innovative, compliant, responsive, and safe services which meet or exceed their expectations and deliver to us a fair return. We respect and comply with all our contractual obligations. We build the trust of our clients by delivering what we have promised, being honest, transparent, and acting with integrity.

#### 6.2 Consultants, Contract Staff and Candidates

We understand our consultants, contract staff and candidates' career requirements and aspirations and strive to introduce them to aligned opportunities. We provide consultants, contract staff, and candidates with the highest levels of service during the assignment process.

#### 6.3 Suppliers, Agents and Alliance/JV Partners

We are committed to fair and honest relationships with our suppliers, agents, and alliance/JV partners. We choose suppliers, agents, and alliance/JV partners objectively based on competence, reliability, value, and business conduct avoiding conflicts of interest or other favoritism that may compromise selection.

We are committed to dealing with suppliers, agents and alliance/JV partners who act in a manner consistent with our Business Code of Conduct. We do not make improper payments to suppliers, agents, and alliance/JV partners. All commissions, fees, payments to suppliers, agents and alliance/JV partners are legitimate, proper, and in accordance with the services provided and the contract agreement.

### 7.0 ASSETS AND PROPERTY

#### 7.1 Protection of Assets

Gallaway and client assets, including property, proprietary information, funds and equipment shall not be misused, abused, maliciously damaged, or wasted. Equipment provided for work is not used for non-business activities, although incidental personal use may be permitted provided it does not violate any provision of this Business Code of Conduct or other Company policies or procedures.

Confidential information is protected. Any necessary information sharing with third parties to enable effective working shall be subject to approval by the Managing Director.

Any damage to either Gallaway or our Client's assets shall be reported immediately to your line manager in order that the correct notifications and actions can be taken.

You must treat all PPE issued by the company with care and respect.

When using Company vehicles, you must adhere to the terms and conditions as detailed in the [Company Vehicle Use Policy](#)

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### 7.2 Intellectual Property

At Gallaway, we have Company brands, logos, ideas, technology, website, processes and procedures that we all use to conduct our business, and which enhances our reputation, and which we all need to protect.

It is equally important that we respect, and avoid infringing, the intellectual property rights of others. Not doing so risks damage to our business and reputation and may impact our ability to operate.

You must use Gallaway's brands, logos, and trademarks appropriately. You must always store Gallaway business and technical information appropriately, and with appropriate access controls. You should not change, amend, or disfigure Gallaway logos or branding whatsoever.

### 7.3 IT systems use and security

Digital equipment, information systems, communication facilities, including, smart phones, networks and databases are all provided for conducting company business. Everyone who uses company or client system, facilities, equipment must ensure that the resources are used appropriately, in accordance with all relevant requirements of this Business Code of Conduct, all relevant security policies and all applicable UK legislation and regulations. Occasional and/or incidental personal use is permitted provided that no inappropriate or illegal media is used and there is no additional significant cost to the Company.

The following conditions apply to the use of all Company information systems:

- You must not share your Gallaway IT login details with others.
- You must not modify or disable security or other configuration settings downloaded by Gallaway to your own IT equipment, unless approved to do so by Gallaway IT.
- You must keep your personal use of IT and electronic communications, including social media use, occasional and brief and not use the Gallaway name, brand or logo in personal emails.
- If you have a corporate mobile phone, you must follow the Gallaway [Mobile Phone and Personal Equipment Policy](#) for acceptable use.
- You must not access, store, send, or post pornography or other indecent or offensive material when using Gallaway IT and communication facilities, nor must you connect to online gambling sites or conduct unlawful activities.
- You must not store or transmit image or (streaming) media files or otherwise generate high network traffic or data storage costs due to personal use.
- You must not conduct your personal business activities using Gallaway IT or communication facilities, or support others to do so.
- You must only use approved internet-based services (whether commercial, consumer or free-to-use) to store, process or share business information in accordance with this Business Code of Conduct.
- You must not access the company server and files from your personal devices, in order to prevent any possibility of file corruption or virus attack.
- All materials and equipment provided by the Company, i.e. mobile phones, laptops, and diaries shall remain the property of Gallaway and should be returned immediately when requested.