



RED ROOSTER LIFTING

Ethics and Business Integrity Policy

This Policy sets out our commitment to behaving ethically and maintaining the highest standards of integrity in the conduct of our business. As individuals, collectively and as a company we will:-

- Apply the principles set out in the Ethics and Business Integrity Policy in everything we do;
- Ensure that we comply with company policies and procedures;
- Comply with applicable laws, rules and regulations; and
- Seek guidance where we are unsure of the appropriate course of action.

The Ethics and Business Integrity Policy sets out the standards and behaviours that all our employees, partners, suppliers and contractors are expected to meet.

Fraud, Bribery and Corruption

Red Rooster Lifting takes the effective prevention and detection of fraud, bribery and corruption and any other fraudulent or corrupt activity extremely seriously. We are fully committed to promoting a zero tolerance approach.

Corruption usually occurs because some individuals are willing to use illicit means to maximise personal or corporate profit. Corruption includes bribery, extortion, fraud, deception, collusion, abuse of power, embezzlement, trading influence and money laundering.

A bribe is an action where a person promises or gives a financial or some other advantage, which is designed to induce any party to perform a function improperly or reward them for having performed a function improperly. Fraud is an act of deception intended for personal gain or to cause a loss to another party.

We will not offer, give or receive bribes or improper inducements for any purposes, whether directly or via a third party. This prohibition applies to all employees, business partners, suppliers, contractors and anyone else acting for and on behalf of Red Rooster Lifting. This Policy applies to every part of our business and we will endeavour to adopt best practices to uphold the provisions of the Bribery Act 2010.

We expect all employees to act honestly and with integrity to safeguard Red Rooster Lifting and our customers' assets, including information, goodwill, property and equipment. We each have a responsibility for fraud prevention, detection and reporting and we encourage anyone with reasonable suspicions of fraud or corruption to report them.

Gifts and Hospitality

We should always consider whether the giving or receiving of a gift or hospitality is appropriate. It is prohibited to offer or receive gifts of hospitality that could influence or be perceived to be capable of influencing the outcome of transactions or decisions relating to Red Rooster Lifting's business.

Conflicts of Interest

All employees must disclose or seek direction on any issues that could potentially conflict with their responsibilities to Red Rooster Lifting.

Conflicts of interest may arise when two or more competing interests could impair the ability to make objective, unbiased business decisions which are not necessarily in the best interests of Red Rooster Lifting. They may take the form of financial interests in a competitor, supplier or customer business, recruiting a close family member, close or longstanding relationships with competitors and suppliers, or customers engaging in employment outside of Red Rooster Lifting. In all cases, potential conflicts of interest should be disclosed to your line manager.

Working with Others and within our Communities

We must ensure that we maintain our ethical standards and behave respectfully when working with others. The relationships with our suppliers, contractors and business partners are based on the principle of fair and honest dealings at all times and in all ways. We expect our suppliers, contractors and any other business associates to extend the same high standards to all others with whom they do business, including employees, sub-contractors and other third parties.

We expect all of our business associates, suppliers and contractors to adopt the same or equivalent standards as set out in this Policy and we reserve the right not to do business with companies where it can be demonstrated that significant violations of this Policy exist.

We aim to be responsible within the local communities that we operate and work in partnership with our communities at all times. Our aim is to create sustainable, long term opportunities in our communities, to support social and economic development.

Compliance with the Law

We operate and function within the applicable laws and regulations. We clearly communicate procedures for disciplining those who do not comply with the law or our standards, procedures and policies and maintain a system for reporting of any breaches through line managers and supervisors.

Commitment to Human Rights (Anti-Slavery and Human Trafficking)

We conduct our business in a manner that respects the human rights and dignity of our people and those we do business with. Each of us can play a role in the elimination of human rights abuses such as child labour, human trafficking, modern slavery and forced labour.

We aim to implement and enforce effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere within our own business or any of our supply chains as far as is reasonably practicable. If you believe there may be any breach of human rights taking place within our operations or those of our business partners or suppliers then please contact your line manager or supervisor immediately.

Anti-Competitive

We believe in fair competition and discourage all forms of anti-competitive practices that could damage our business. Employees should never encourage customers, suppliers or former employees of competitors to provide confidential information or seek, accept or discuss confidential information with competitors.

Equality and Diversity

We pursue equality and inclusion for all employees through our employment policies and practices. We aim to create an inclusive environment which provides equality of opportunity and freedom from unlawful discrimination on the grounds of race, gender, pregnancy and maternity, marital or civil partnership status, gender reassignment, disability, religion or beliefs and age or sexual orientation.

We must all challenge discriminatory behaviour when we see it and we are committed to actively opposing all forms of discrimination. If you have any concerns regarding unfair or discriminatory practices, please contact your line manager or supervisor.

Preventing Harassment and Bullying

We will not tolerate harassment or bullying. Harassment and bullying can take many forms and have serious consequences. We must all take responsibility to ensure that such behaviour does not happen at Red Rooster Lifting and ensure that we treat each other respectfully and challenge any unfair behaviour. We may instigate disciplinary or legal action against people who harass or bully others.

Whistleblowing

We are committed to carrying out our business in a safe, honest and ethical way. Part of that is creating an open and supportive working environment where employees feel able to speak up about any suspected wrongdoing. If you are concerned that any of the things below are happening, have happened or are likely to happen, we encourage you to raise this as soon as possible:-

- Any bribery, fraud or other criminal offence
- Miscarriage of justice
- Risk to colleague and/or public health and safety
- Risk or actual damage to the environment
- Breach of any other legal or professional obligation
- Someone is covering up wrongdoing

If you need to raise a concern you can raise the issue directly with your Line Manager, HR representative or any other Manager. You can raise things either in person or set out your concern in writing. It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns under this policy even if they turn out to be mistaken.

Employees must not suffer any detrimental treatment as a result of raising a concern. Employees must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

Environmental, Social and Governance (ESG)

We believe that a commitment to the principles of environment, social and governance (ESG) not only makes good business sense but also compliments our business strategy and our corporate values. Our commitment to ESG extends across all our stakeholders, from our people to our customers to our communities.

We aim to create an inclusive and supportive environment and we take the health, wellbeing, safety and security of our employees as paramount to our operations. This further extends to customers, our partners and the businesses and organisations we work with.

We are committed to taking meaningful action to tackle climate change by minimising our emissions and developing low carbon infrastructure.

Signed



Paul Shewan
Managing Director
Red Rooster Lifting Limited
Date: 8th January 2026