Blyth Construction (SW) Ltd

Supplier and sub-contractors code of conduct

Reviewed October 2025

Contents

Section one
Supplier Code of Conduct

Section two
Our values and ethics

Section three
People
Health and safety
Wellbeing
Respecting human rights
The real living wage
The Prompt Payment Code
Conflict minerals

Section four
Economy
Community and workforce resilience
Resilience and business continuity

Section five
Environment
Protecting the environment

Section six
Governance
Business Ethics Standards, fraud, bribery and corruption Entertainment, hospitality, gifts and cash rewards Testimonials and endorsements
Social media
Security
Operational security
Data protection
Subcontracting and supply chain
Tax compliance
Monitoring and reporting

Section one:
Supplier Code of Conduct

Blyth Construction is committed to being a responsible business in everything we do.

We value our relationship with suppliers and sub-contractors, as you play an essential part in helping create a more social, economically, and environmentally responsible supply chain.

Our Code of Conduct sets out our expectations, values, and fundamental principles which we expect you to extend into your business and your own supply chain.

We are a purpose-led organisation and how we work is as important as what we do.

Responsible business is how we do business, and we expect our suppliers and sub-contractors to ensure compliance with this code.

We expect you to carry out your business in line with the values and aspirations outlined in this document, to act in accordance with the highest ethical standards and comply with all relevant laws, regulations and licenses when supplying or working for us to help achieve our clients' projects however small or large.

Section three: People

We will develop the skills and strive to build a diverse workforce and inclusive culture.

Health and safety

In line with our key values, ensuring the health and safety of our employees, contractors and members of the public is our number one priority.

We want to be a recognised leader in the development and operation of safe, reliable, and sustainable construction to meet the needs of our customers and communities.

We believe that everyone we contract with, collectively and individually, has a part to play to achieve this.

We recognise our operations give rise to risk; however, we believe through commitment, robust management, and compliance with legislation/ industry best practice, we can eliminate or minimise these risks to a safe level.

We expect the same commitment from our suppliers.

To work with Blyth Construction, you must understand your health and safety responsibilities and be committed to creating an environment that is safe, healthy, and secure for all your employees, and anyone who may be affected by your undertaking.
The safety of employees, contractors and members of the public is a mutual priority.

Wellbeing

Managing the wellbeing of our employees, contractors and supply chain is also one of our priorities. We know that where our people are engaged and healthy our work is more efficient, and our culture is more positive. We focus on the physical aspects of health, understanding the impact this may have on the psychological aspects of health too and we encourage you to do the same with your employees. We ensure we understand our fatigue risk, our stress risk, and that we design our workplaces and tasks around wellbeing needs, to ensure healthy and engaged employees and expect you to take the same approach to ensure wellbeing is a priority for your workforce.

Respecting human rights

Blyth Construction requires all businesses in our supply chain to share our commitment to respecting, protecting, and promoting human rights.
This includes alignment to the United Nations Guiding Principles on Business and Human Rights, The United National Global Compact Ten Principles, the core labour standards of the International Labour Organisation (ILO),
As a minimum, we expect:

- Employment is freely chosen
- the right of collective bargaining
- safe and hygienic working conditions
- no use of child labour
- payment of the Real Living Wage
- no excessive working hours
- no discrimination
- regular employment
- no harsh or inhumane treatment

In meeting these expectations, you should have a **full** understanding of your business operations and wider supply chain, and ensure that any potential human rights risks are assessed, managed, and mitigated.

You must comply with the requirements of the Modern Slavery Act 2015,

We encourage you to publish a statement on modern slavery regardless of whether this is a legal obligation to do so.

On request, we may require further information detailing your approach to risk assessment and evidence of how you might mitigate any identified risks in your own business and supply chain.

The real living wage

Blyth Construction and contractors working on its behalf to pay, as a minimum, the real living wage as promoted by the Living Wage Foundation.

This is defined as contractors aged over 18 who work on our sites for two or more hours a week or eight or more consecutive weeks.

This is an important principle for us, not just because it is the right thing to do, but because as a responsible business, we believe that everyone should be appropriately rewarded for the work we do to safely and reliably achieve our customers requirements.

We are asking for voluntary participation from suppliers. On request, we may require verification that the real living wage is being paid.

We expect employment agency partners to uphold the same standards of employment that we offer our direct employees and adopt the "employer pays" principle. This means that no employee of National Grid should ever have to pay to obtain access temporary or permanent work within our organisation or supply chain.

The Prompt Payment Code:

Blyth Construction commits to the fair treatment of our suppliers by abiding by the Prompt Payment Code.

We encourage our suppliers to adopt the principles of this code throughout their own supply chains.

Conflict minerals

Blyth Construction's policy is not to use products containing conflict minerals.

We expect you, as a business in our supply chain, to have a policy and controls **in** place to monitor and prevent the use of minerals sourced illegally or unethically.

If you know, or have reason to believe, that conflict minerals may be contained within the product that you are supplying to us and these are not from recycled or scrap sources, you must exercise due diligence to determine the source and chain of custody of the conflict minerals or derivatives.

You must document your efforts and make your due diligence measures available to us on request and provide us with evidence of the origin of the conflict minerals in products supplied by you to us.

Section Four: Economy

Community and workforce resilience

Our approach to responsibility in our communities goes beyond safe methods of work.

It is also about making sure our economic and social role in the community has the greatest possible positive impact.

We recognise the role the supply chain can play in supporting this approach and Blyth Construction expects suppliers to understand how their activities impact their local area and wider community.

We encourage them to make positive contributions and investments where appropriate, for example by providing local employment opportunities, skills, development, and workforce volunteering.

We expect our suppliers to build positive relationships and minimise disruption to communities.

Blyth Construction is committed to skills development within our own business and that of our supply chain to meet the skills gap challenges recognised as an issue in construction

We strive for affordability and fairness, and we will develop skills for the future, with a focus on lower income communities to meet workforce resilience demands.

We expect our suppliers to support our approach to developing the workforce of the future to meet our net zero commitments and focus on formal training programs targeted in areas considered to be in short supply.

Resilience and business continuity

Blyth Construction expects all businesses in our supply chain to have aligned resilience and business continuity arrangements with Crisis Management and Pandemic Plans in place.

These should be tested annually to ensure that you can continue to provide your services to Blyth Construction in the event of any disruption to your operations.

As a minimum, these resilience arrangements should consider:

- people
- premises
- process (information and technology)
- providers.

These arrangements should be reviewed and exercised on a regular basis.
More details will be provided through the procurement process.

Section Five: Environment

Protecting the environment

At Blyth Construction we are committed to being a responsible business, we recognise the value of the natural environment and we ensure that environmental sustainability considerations are included in our investment, procurement, and operational decisions.

We expect all our suppliers to support us in this approach and actively work towards making a positive impact on environmental factors linked to our operations.

We are all responsible for protecting the environment.

As a minimum we require you to:

- comply with all legal requirements and obligations and have in place an environmental management system that is aligned to the requirements set out in standards such as ISO14001.
- act to prevent pollution which may result from your activities
- ensure that any activities that have an impact on natural habitats are conducted in a manner to protect biodiversity
- assess ways to reduce the impact of climate change on your activities by implementing mitigation and adaptation measures
- implement an environmental strategy and establish relevant metrics and targets, including, but not limited to:
  - the reduction of GHG emissions, helping us on our journey to net zero (and supporting the CDP supply chain program if requested)
  - a waste management process, aiming for zero waste sent to landfill (and if requested, report how much waste you produce)
  - tracking of energy usage, using renewable sources where feasible and increasing energy efficiency where possible.
  - Provide energy efficiency strategies upon request.
  - ensuring resources are used efficiently, through good design, the use of sustainable materials, using less packaging, re-use, recovery, and recycling of materials
  - seeing ways to enhance the natural value of the area for the benefit of communities and/ or the environment
  - a water management process to manage related risks including current and future water stress.

Our aim is to demonstrate technical and commercial solutions to help achieve net zero for the construction sector.

We are trying to reduce our own greenhouse gas emissions and continue to explore finding suppliers and sub-contractors with the same ethical outlook.

We encourage all our suppliers to align to targets that are aimed at limiting the global temperature rise to 1.SC (above pre-industrial levels).

Section Six: Governance

We will make sure our governance mechanisms reflect our commitments, and that the principles of responsibility guide us in everything we do.

Business Ethics Standards, fraud, bribery, and corruption

At Blyth Construction, we are committed to our business in a fair, honest, and open way, and we expect you to be honest and fair as you conduct your business. We have a zero-tolerance approach to any type of bribery, fraud, or corrupt business practices. We expect you to have a programme in place to prevent these activities. We expect you to have procedures in place in accordance with all applicable local, state, federal or national laws or regulations.

This includes without limitation, the UK Bribery Act 2010, UK Finance Act 2017 (Criminal facilitation of Tax Evasion)

We require you to have processes in place to protect employees who provide information related to any unfair or inappropriate business activities (whistleblowing), ensuring that you do not reveal their identity. In return, we ask that you communicate with us any business activities that could be deemed inappropriate so we can proactively work together to find resolution. In the event that we need to investigate any concerns, we expect you to fully cooperate and support/ facilitate any required investigative activity. •

We reserves the right to review your control procedures associated with the prevention and detection of fraud, bribery, and corrupt business practices. If we have serious concerns, whether they relate to our business or not, we will review our relationship with you.

Entertainment, hospitality, gifts, and cash rewards

We require you to help enforce our rules on business rewards, such as gifts, meals, hospitality, and entertainment.

We may accept hospitality and entertainment as long as it is appropriate, has a genuine business purpose.

We do not expect our employees to take part in any activity that would affect their judgement when dealing with you.

We do not allow our staff to accept cash or cash equivalents, such as gift certificates.

Employees who directly buy goods, works or services for our business are not allowed to give or receive any gifts, hospitality or entertainment.

Social media

Social media is now an integral part of our society. It enables us to convey messages and opinions to a wide audience instantaneously.
The messages you convey become permanent public statements reflecting upon you, your business, your clients and customers - we must be able to recognise the perception of these actions and behaviours.
We expect you to use social media in a responsible, reasonable, and respectful manner

If your social media activity is linked in any way

- or could be deemed to be related to Blyth Construction
- by our customers, key stakeholders or others,

the company has a legitimate interest in what is in the content being published, whether this is posted through a business or personal account. In particular, the posting of confidential proprietary information or business secrets, discriminatory, harassing, offensive, bullying, abusive, threatening, false or misleading comments are unacceptable.
No new social media channels should be created without written permission from Blyth Construction.
Don't share embargoed company announcements prior to the time and date specified, or discuss sensitive business-related topics, such as our performance, or anything to jeopardise our trade secrets, confidential company information or intellectual property.

Any breach of the above may result in action and could involve us requesting that you cease providing services. Anyone suspected of committing a breach of this policy will be required to cooperate with our investigation.

Remember that, when you give recommendations about working with certain people you are doing this in your personal capacity, and this must be clear in the wording you use. You must not suggest that Blyth Construction is recommending or endorsing. You cannot refer to any Blyth Construction proprietary information or anything else that is confidential
or involves our customers.

Contractors working as contracted employees should ensure to adhere to the above.

Security

Blyth Construction is committed to ensuring effective controls are in place to protect employees and company assets, including physical and intangible assets such as information.

Any significant compromise of personnel, physical, information, or IT security could result in disruption, with potentially serious economic, delivery, safety, and social consequences.

We expect all our supply chain partners to demonstrate a similar commitment to security and have at a minimum the:

- appropriate internal policies and procedures covering people (e.g. background checks), process and technology
- security controls proportionate to the risk, which support the policies and procedures
- independent accreditation and assurance that security controls are in place
- necessary controls in place to detect security anomalies
- plans defining the appropriate activities to perform to respond to security incidents and events and recover from them.

In addition, any suppliers with access to Blyth Construction data, equipment, people or information assets or their customers, will also be required to align the requirements of, or equivalent to Blyth Construction or their customers policies

Any violations to Blyth Constructions Policies will be investigated and appropriate action will be taken.

Operational security

To ensure our commitment to delivering operational excellence, including excellent levels of security we will be relying on the cooperation of suppliers.

If you have been identified as a supplier who supplies us with a product or service we expect you to:

- agree and implement enhanced organisational and technical policies, procedures, and controls where relevant.
- work with us to provide any information requested by the pertinent authorities to ensure we are compliant with the relevant laws and regulations.

Data protection

Personal data should be protected fully in compliance with all relevant data protection legislation including the General Data Protection Regulations or equivalent provisions.

Data protection and privacy laws regulate the collection, storage, use, disclosure, and disposal of personal information, which can identify a living person.

We risk assess and carryout due diligence on our suppliers to ensure they meet our required standards. This may involve the collection of supplier personnel personal data, including, but not limited to the results of any background checks, names, and email addresses.

We expect you to have obtained the necessary consents from your personnel for us to receive and process this personal data.

We expect you to:

- process personal information in a fair, lawful, and transparent manner
- only collect the personal information required to fulfil the service you are providing and to not further process this information in a manner incompatible with this service.
- take steps to ensure personal information remains accurate and up to date.
- have a retention schedule to ensure personal information is not retained longer than is necessary.
- implement organisational and technical measures to ensure the integrity and confidentiality of personal information.
- reasonably co-operate with and assist on data protection impact assessments or compliance matters which relate to the processing activities being carried out by you on behalf of Blyth Construction.

Subcontracting and supply chain

Where allowed and we subcontract work or services to third parties, we require the following:

- prior written approval for contractors with transparent support locations
- subcontractors and third parties are informed, agree, and adhere to the provisions of this Supplier Code of Conduct and relevant agreements.
- risk assessments with proper due diligence performed (issuing CPP & RAMS where required)
- agreement that subcontractors or third parties are responsible for their own acts/ works and monitor alng side Blyth Construction
- provide evidence upon request that the above is taking place.

Tax Compliance

Blyth Construction expects its suppliers to ensure that they remain compliant with changes to UK tax law, and we will not work with suppliers who engage in any practices which may constitute tax evasion or involve workers not being taxed appropriately. For example, we expect you to have procedures in place to prevent the facilitation of tax evasion and other offences as set out in the Criminal Finances Act 2017.

There is an expectation to report any breaches of data or information as a matter of urgency.

Monitoring and reporting

Blyth Construction requires you to evaluate your activities to make sure you are keeping to this Supplier Code of Conduct and adhering to its provisions.

We expect you to be able to demonstrate compliance to the principles set out in this document whilst working on behalf of Blyth Construction if requested.

You must have a process in place to remedy any instances of non-compliance, breaches or problems identified through audits, reviews, or inspections.

You should bring to our attention immediately any significant issue, non-compliance or potential breach of legislation or regulation.

We also expect you to investigate and report any concerns or complaints you have about issues to do with breaking the law or standards which relate to our business, sub-suppliers or sub-contractors.

We can then investigate and deal with these issues.

We expect all to fully co-operate with us during any investigation we carry out, and we do not accept any type of retaliation against any person or business who raises any concerns.

You should have suitable training in place for key personnel working with Blyth Construction or its customers as required, introducing this Supplier Code of Conduct and its provisions along with your relevant policies and procedures.

We may request, periodically, a letter of assurance certifying that you have complied or have brought issues to Blyth Construction's attention in a timely manner.

We may conduct an audit or ask for further information relating to any of the areas mentioned above.

Please use your usual contact paths and follow up with an email to info@blythconstruction.co.uk

Thank you

Review date January 2028 or as required

Section two
Our Values and Ethics

We're committed to being a responsible business in everything we do.

Our values describe what we stand for and guide our behaviour.

They set the tone and shape the culture of our organisation.

Every day we:

Do the Right Thing

- Act safely, inclusively and with integrity.
- Support and care for each other.
- Speak up, challenge and act.

Find a Better Way

- Work as one team to find solutions.
- Embrace learning and new ideas.
- Simplify to what really matters.

Make it Happen

- Be bold and act with passion and purpose.
- Take ownership to deliver to customers.
- Focus on progress over perfection.

We take pride in our reputation for working responsibly with our customers & colleagues and we require the same standards from our suppliers.

We are committed to promoting an environment where everyone can feel comfortable raising concerns about actions or decisions they think are unethical.

We strongly believe in openness and transparency and encourage our employees and those working on our behalf to raise any concerns.

Examples of unethical behaviour may include, but are not limited to bullying, harassment, discrimination, fraud, bribery, corrupt business practices, human rights violations and any other unfair practices committed at a personal or business level.

If you believe that an employee, contractor, or anybody else doing business with us has acted unethically or unlawfully, you must quickly bring this to our attention using the confidential helpline available on the front page.

In return, we will investigate the facts thoroughly, fairly and promptly when you raise a concern.

This will be undertaken in the strictest confidence, and we will not tolerate any form of retaliation or victimisation, where a concern is raised in good faith.