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# Business Integrity & Ethics

Prepared for: Digby Civils Ltd  
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## **ABOUT DIGBY CIVILS LTD**

### **Family Run**

We are a family owned company that has over 40years extensive experience based in South Wales. We supply operated and self drive plant hire, offering a variety of high quality services.

### **Diverse**

We accommodate a considerable array of clients including local and health authorities, infrastructure companies, railway companies, general builders, surveyors, agricultural contractors and private companies on a national basis.

### **Quality**

All plant operators are CPCS and PTS card holders with a minimum of 7 years experience. All operators are regularly updated in health and safety issues. All operators must hold up to date fit to work medicals. Plant operators are multi-disciplined with vast experiences.

### **Flexible**

No job is too big or too small for our capabilities. We offer a personal service that will suit your needs.

## **OUR ROLE AND RESPONSIBILITY**

Every individual within Digby Civils Ltd must obey the law and carry out their role to the best of their ability, at all times. We are all responsible for respecting

all applicable laws and following the policies in our code.

### The Role

All employees of Digby Civils Ltd must understand their role they play in the company and understand in detail the position of their role and what exactly is involved in that particular role. All employees must be careful to act within the limits of that authority.

### Guidance

All employees are encouraged to seek additional help and guidance to ensure company policies and procedures are carried out and subsequently Digby Civils Ltd's high standards are adhered to. Help and guidance can be found with the director, plant managers and other plant operators. Policy handbooks are always readily available to refer for more detailed information.

### Compliance

All employees must adhere to this company code and policy. Failure to do so could result in disciplinary action which could lead to termination of employment. This also includes those in senior positions who are aware of violations and who do not promptly report and correct the issue.

Any

knowledge of information that could be damaging to Digby Civils reputation must also be reported.

## **OUR EMPLOYEES**

### DIVERSITY

This is a core value in Digby Civils recruitment process because it allows a variety of creativity, experience and individuality within the company, ensuring enthusiasm to all challenges that arise. Digby Civils Ltd has an inclusive community that promotes diversity which in turn allows individuals to thrive.

### EQUAL OPPORTUNITY

Digby Civils Ltd promotes a diverse working environment and subsequently each potential employee will sign an equal opportunity form. Digby Civils Ltd follows the laws that prohibit discrimination in employment practices. Digby Civils Ltd provides equal employment opportunities for all, treating everyone with the same respect and no illegal bias. It is Digby Civils company policy to NOT discriminate on any of the following:

- Race
- Religion
- Colour
- National Origin
- Age
- Sex
- Gender Identity
- Gender Expression
- Political Preference
- Sexual Orientation
- Membership or non-membership in any lawful organisation
- Genetic Information
- Disability
- Veteran Status

## Alcohol and Drug

Digby Civils Ltd prohibits the use, possession, distribution, purchase or sale of drug and alcohol on its premises or while conducting any business for the company, including operating any company equipment. Any individual under the influence of drug or alcohol substances are not permitted on the company premises and if found to be influenced so will undergo disciplinary action which could lead to termination of employment.

In certain circumstances, for example an official company event, the use of alcohol may be authorised as long as permission is received in advance from the relevant company department management.

Where allowed by the law, Digby Civils Ltd, may conduct searches and test for drug and alcohol use.

## Harassment

Digby Civils Ltd prohibits actual or threatened violence against co-workers, visitors, clients or anyone else on Digby Civils Site. All treats will be taken seriously and action will be taken immediately.

If you are confronted with workplace violence or harassment then you should report it immediately to the plant manager.

## HUMAN RIGHTS

### What are human rights?

Human rights are defined as the basic rights and freedoms to which all humans are considered to be entitled, often held to include the rights to life, liberty, equality, freedom of thought and expression and others.

### Our Commitment

Digby CIVILS Ltd has a commitment to conduct business that are consistent with the spirit and intent of the *United Nations Universal Declaration of Human Rights*.

- Digby Civils Ltd treats employees with dignity and respect and promote diversity within the workplace.
- Digby Civils Ltd protects personnel and assets and all confidential information. Please read our Data Protection policy for more detailed information.
- Digby Civils Ltd engages with communities to build upon understanding of potential human rights issues in order to enhance our community projects and manages potential impacts.
- Digby Civils Ltd also encourages our suppliers to treat their employees and their interactions with the community in a way that acknowledges and promotes human rights.
- Digby Civils has an ethical sourcing policy, which ensure that the companies we work for and companies that work for us have the same commitment to human rights.

- Digby Civils also has a Modern Slavery Policy; we are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Employees

All employees are required to comply with Digby Civils human right policy. This means conducting yourself in accordance with the Digby Civils Ltd way, understanding local law, reading and acknowledging this Business Conduct and Ethics Code and finally reporting any non compliance to the human right policy.

## COMAPNY RECORDS

Digby Civils books and records must be prepared as accurately and honestly as possible by anyone who contributes to the creation of business records.

All records must be supported by enough documentation to provide a complete, accurate, valid and auditable record of each transaction. This is essential to Digby Civils Ltd's success, integrity and good reputation.

Both Digby Civils Ltd's policy and numerous laws indicate a requirement of complete and accurate paperwork. It is considered a serious offence to conceal or tamper with documents, it could result in disciplinary action or even criminal prosecution. All individuals are responsible for reporting any suspected violations.



Any suspected violations should be reported to the plant managers or directors.

It is the responsibility of each individual to be aware of the internal controls of Digby Civils Ltd and how they are relevant to the individuals position and that policies are adhered to related to those internal controls.

Engaging in fraud violates company policy and the law and consequences will follow. This includes misusing or stealing company assets or falsifying a travel and entertainment expense report among other things.

## **AVOIDING CONFLICTS OF INTEREST**

All individuals within Digby Civils must act in the best interest of the company.

Business decisions must be made objectively and impartially, free from any conflict of interest. An activity is considered a conflict of interest if:

- it has a negative effect on Digby Civils Ltd's business interests.
- it damages or has a negative impact of Digby Civils Ltd's business relations or reputations.
- it interferes on an employees judgement in carrying out their role or duties.

All employees or directors must never:

- Compete against the company.

- Use their position or influence to secure individual benefit over Digby Civils benefit.
- Take advantage of inside information.
- Use company information, assets or resources for their personal gain or the improper benefit of others.

If you believe you might be in a position which could be construed as a conflict of interest then report the situation immediately to a plant manager. All conflicts of interest must be reported.

It is also a conflict to give or receive gifts more than nominal value or cash in any amount from people who are looking to do business with Digby Civils Ltd. Do not accept cash/ gifts in exchange for business.

## **OPERATIONAL EXCELLENCE**

Digby Civils has a policy to protect the health and safety of all employees, all individuals associated with Digby Civils and the environment, this means that Digby Civils must conduct all operations reliably and efficiently.

### **Health and Safety**

Due to the nature of the work, the equipment we use and the environments we work in, health and safety is foremost in Digby Civils mind. Our health and safety advisor is key to ensure all procedure are carried out in the correct manner and that all employees are aware of these procedures. All employees must communicate with the health

and safety advisor to ensure that all policies are acknowledged and understood.

Maintaining a disciplined and high quality systematic management of health and safety, the environment, reliability and efficiency requires high standards and expectations from all employees of Digby Civils.

All employees must comply with the company policy concerning the environment, health and safety and always meeting the requirement of our operational management system.

Each of us has the authority and responsibility to stop – or not start – any work activity if hazards or risks pose a threat to safety or the environment.

## **PROTECTION OF INFORMATION & DATA PRIVACY**

### **Use of Personal Data**

All employees must use the proper care and attention required when using personal information. This type of information can involve anyone who does business with Digby Civils. It is vital to our success to be discreet and treat with respect. There are laws which regulate how we collect, use and dispose of personal data, which all employees must be aware and accustomed to. Digby Civils advocates trusting and honest business relationships with clients, so it is essential that these guidelines are adhered to:

- Personal data should only be collected and processed if there is a legitimate business reason to do so.
- Collect and use only the personal data that is required for the job at hand.

- All personal data should be kept confidential using Digby Civils policies and guidelines.
- Only authorised individuals may properly disclose/ use personal information with the required permission.
- Personal computers are not permitted to be used with personal information. Authorised permission must be sought from the plant managers or director.

We all have a responsibility to understand the risks when our information assets are compromised.

## Use of Business Data

Digby Civils has a lot of assets and vital resources that includes both paper and electronic records and involves Digby Civils trade secrets, trademarks and copyrights material. Handling of this sensitive material is vital when working for Digby Civils.

Discretion is of the utmost importance when using classified information and again authorised permission must be sought before disclosing any of this information with only legitimate need to know parties.

Digby Civils policies on confidential data must be adhered to because they safeguard from theft, fraud, misuse or careless handling. Employees who are unsure of their jurisdiction or authority on this matter should seek advice from the Plant Managers or Director.

Improper use of data and information could lead to disciplinary action which could potentially result in a termination of employment. Examples of improper use are;

unauthorised viewing, use, copying, distributing or removing of data from the site, damaging and altering of information.

We must also comply with all laws, regulations and contractual commitments regarding the valid and enforceable intellectual property rights of third parties, including patents, copyrights, trade secrets and other proprietary information. We will not knowingly infringe on or misuse the valid and enforceable intellectual property rights of third parties.

All employees of Digby Civils are responsible for keeping the company's computer systems and resources as private as possible. All passwords, ID numbers etc must be kept confidential and in a secure place, they must not be shared with others.

Documents and paperwork that do not qualify as company records should not be retained past the time that they serve a business purpose.

**Please read Digby Civils 'Data Protection Policy' for more detailed information on this issue.**



**Daniel Digby**  
**Director**  
30.03.2020



### **Code of Ethics** **DIGBY CIVILS LTD**

Digby Civils Ltd will conduct its business honestly and ethically wherever we operate in the world. We will constantly improve the quality of our services, products and operations and will create a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgement.

No illegal or unethical conduct on the part of directors, managers, employees or affiliates is in the company's best interest. Digby Civils Ltd will not compromise its principles for short term advantage. The ethical performance of this company is the sum of the ethics of the men and women who work here. Thus, we are all expected to adhere to high standards of personal integrity.

Directors, managers and employees of the company must never permit their personal interests to conflict with the interests of the company, its clients or affiliates. Directors, managers and employees must be careful to avoid representing Digby Civils Ltd in transactions with others in any capacity outside of business relationships. Directors, managers and employees will refrain from using their company contacts to advance their private business or personal interests at the expense of the company or its clients.

Directors, managers and employees of Digby Civils Ltd will occasionally come into contact with private and confidential information of a business-sensitive origin and thus will take the appropriate steps to assure that such information is strictly safeguarded. This information could be strategic business plans, operating results, customer lists, personal records, new investments, manufacturing costs, processes and methods. Proprietary, confidential and sensitive business information should be treated with sensitivity and discretion and only be disseminated on a need to know basis. Misuse of material inside information in connection with trading in the companies securities can expose an individual to civil liability and penalties such as disciplinary action, which could subsequently lead to termination of employment.

The following guideline should be followed when dealing with confidential inside information:

- Until the material information has been publicly released by the company, an employee must not disclose it to anyone except those within the company whose positions require use of the information.
- Employees must not buy or sell the companies securities when they have knowledge of material information concerning the company until it has been disclosed to the public and the public has had sufficient time to absorb the information.

Directors, managers and employees will seek to report all information accurately and honestly and as otherwise required by applicable reporting requirements.

Directors, managers and employees will refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge which has been gathered in such a manner. The directors, managers and employees of Digby Civils Ltd will seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

Directors, managers and employees will obey all Equal Employment Opportunity laws and act with respect and responsibility towards others in all of their dealings.



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Directors, managers and employees will remain personally balanced so that their personal life will not interfere with their ability to deliver quality services to the company and its clients. Directors, managers and employees agree to disclose unethical, dishonest, fraudulent and illegal behaviour or the violation of company policies and procedures, directly to management.

Violation of this code of ethics can result in discipline, including possible termination. The degree of discipline relates in part to whether there was a voluntary disclosure of any ethical violation and whether or not the violator cooperated in any subsequent investigation. Remember that good ethics is good business.

**Daniel Digby**  
**Director**  
**30.03.2020**



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**Business Ethics and Conduct Disclosures Statement**  
**DIGBY PLANT LTD**

1) Are you familiar with and do you support the company's Code of Ethics?

YES                      NO

2) Are you aware of any illegal, unethical or improper practices or conduct anywhere within this company?

YES                      NO

3) Have any threats or promises been made to you in connection with your answers to the questions on this form?

YES                      NO

I declare under penalty and perjury, that the forgoing is true and correct.  
Executed on:

**EMPLOYEE**

**COMPANY**

Authorised Signature

Authorised Signature

Print Name and Title

Print Name and Title

Date:

Date: