

## Code of Conduct

**Company:** Connexion Developments Ltd

**Review Cycle:** Annual or upon significant business change

January 26

### 1. Purpose

This Code of Conduct sets out the principles, standards, and behaviours expected of everyone working for or on behalf of Connexion Developments Ltd. It supports our commitment to ethical, responsible, and professional business practices and underpins our Corporate Social Responsibility (CSR) Policy.

The Code provides clear guidance to employees, directors, contractors, and business partners on how we conduct ourselves in all business activities.

### 2. Scope

This Code of Conduct applies to:

- All employees and directors of Connexion Developments Ltd
- Temporary staff, contractors, and agency workers
- Suppliers, manufacturers, and service providers acting on our behalf

All parties are expected to comply with both the letter and the spirit of this Code.

### 3. Our Core Principles

Connexion Developments Ltd operates according to the following core principles:

- Integrity and honesty in all business dealings
- Compliance with applicable laws and regulations
- Respect for colleagues, customers, suppliers, and partners
- Professionalism, accountability, and transparency
- Responsible decision-making and attention to detail

### 4. Legal and Regulatory Compliance

We are committed to complying with all applicable UK and international laws, regulations, and standards relevant to our activities, including those relating to:

- Health and safety
- Employment and labour laws
- Environmental protection
- Product compliance and certification
- Data protection and privacy

Employees must familiarise themselves with laws and internal policies relevant to their role and seek guidance if uncertain.

### 5. Ethical Business Conduct

Connexion Developments Ltd has zero tolerance for unethical behaviour.

We will:

- Conduct business fairly and honestly
- Avoid conflicts of interest, or declare them where they arise
- Prohibit bribery, corruption, facilitation payments, or improper inducements
- Compete fairly and responsibly in the marketplace
- Communicate truthfully and accurately in all marketing and commercial materials

This Code operates alongside our Anti-Bribery and Anti-Corruption Policy.

### 6. Conflicts of Interest

Employees and directors must avoid situations where personal interests conflict, or appear to conflict, with the interests of the company.

Any potential conflicts — including financial interests, outside employment, or personal relationships with suppliers or customers — must be disclosed to management promptly.

### 7. Gifts, Hospitality, and Benefits

Gifts or hospitality must never influence, or appear to influence, business decisions.

- Modest, infrequent, and proportionate hospitality may be acceptable
- Cash or cash-equivalent gifts are not permitted
- Any gift or hospitality that could be perceived as excessive must be declared

Further guidance is provided in our Anti-Bribery and Anti-Corruption Policy.

## 8. Respect, Equality, and Workplace Behaviour

Connexion Developments Ltd is committed to providing a respectful, inclusive, and professional working environment. We do not tolerate:

- Discrimination, harassment, or bullying
- Offensive, intimidating, or inappropriate behaviour
- Abuse of authority or position

All individuals must treat others with dignity and respect, regardless of role, background, or personal characteristics.

## 9. Health, Safety, and Wellbeing

The health, safety, and wellbeing of employees and visitors is a priority.

We are committed to:

- Maintaining a safe working environment
- Following all health and safety procedures
- Reporting hazards, incidents, or near misses
- Supporting employee wellbeing and safe working practices

Everyone has a responsibility to act safely and responsibly at work.

## 10. Confidentiality and Information Security

Employees and partners must protect confidential business information, including:

- Customer and supplier data
- Commercially sensitive information
- Pricing, designs, and technical data

Information must only be used for legitimate business purposes and handled in accordance with data protection laws and company policies.

## 11. Responsible Use of Company Assets

Company property, systems, and resources must be used responsibly and primarily for legitimate business purposes.

Misuse, unauthorised access, or negligent handling of company assets is not permitted.

## 12. Reporting Concerns and Breaches

Any suspected breach of this Code, or other company policies, must be reported promptly.

Concerns may be raised with:

- Line management
- Senior management or company directors

Reports will be handled fairly, confidentially, and without retaliation.

## 13. Enforcement and Disciplinary Action

Failure to comply with this Code may result in disciplinary action, up to and including termination of employment or business relationships.

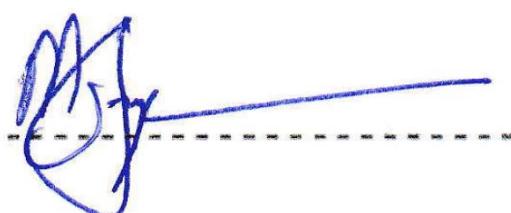
All breaches will be assessed proportionately and in line with applicable procedures and employment law.

## 14. Policy Review

This Code of Conduct will be reviewed annually or following significant changes to business operations or regulatory requirements.

### Approved by:

Managing Director



For and on behalf of Connexion Developments Ltd