



Business Ethics Policy

Statement

Genco Construction Services Limited is fully committed to providing all necessary resources needed to achieve and maintain the highest possible levels of service. Through our established Policies and Procedures and in conjunction with our experienced and competent teams, Genco is prepared and determined to meet the challenges of the construction industry.

Ethical conduct is defined as that which is morally correct and honourable. To maintain our valuable reputation for service excellence and to continue to evolve we must conduct our business in a manner that is legal and ethical. This Ethics Policy sets out Genco commitment to ethical business practices. It details the fundamental principles of ethical business behaviour and defines the responsibilities of all employee and Company representative.

Conduct

All employees of Genco are required to adhere to the ethical guidelines set out in this policy always and to follow the principals of:

Compliance with Laws

At all times, Genco, will conduct business, whether domestic or international, ensuring compliance with all current applicable laws and regulations, ensuring that all laws are strictly followed whilst carrying out works. We will not tolerate illegal activity conducted for person gain or on the Company's behalf.

Honesty and Integrity

All dealings with other employees, public, the business community, shareholders, customers, suppliers, competitors and government authorities will always be carried out with honesty and integrity taking into consideration the reputation and credibility of Genco.

Entertainment and Gifts

Genco employees are not to accept gifts, entertainment or any other benefit from an individual or organisation doing business with us if the gift, entertainment or benefit could be deemed to influence a business decision.

Genco are never to provide a gift, entertainment or benefit that contravenes any applicable law.

Consultant Fees, Commission and Other Payments

Never give or receive any payment that falls outside the normal conduct of business. All fees and payments are to be reasonable in the context of acceptable practice and compliant with applicable policies. All payments given or received are to be properly recorded in the company's accounts. The acceptance of kickbacks, bribes or payoffs will result in immediate disciplinary action.

Compliance with Accounting Controls and Procedures

All staff are to comply with the company's accounting procedures and controls and all applicable laws. All financial data and transactions will be properly recorded.

Conflict of Interest and other Misconduct

Genco expect all employees to act only in the best interest of the Company. Should a situation arise which could give rise to a conflict of interest then this information must be disclosed to the Management Team.

Corporate Information and Confidentiality

All employees will have access to some confidential information. All employees are to sign a confidentiality agreement as part of their contract of employment. Except as required in the normal course of performing your job do not reveal confidential information to anyone either while employed by us or after you leave the company.

Employment Practices

Genco strive to ensure that the work environment is a positive one which supports employees and encourages productivity, dignity and self-esteem. Equal Opportunity and Fairness is provided for in our company policies and procedures.

We do not discriminate based on race, ancestry, place of origin, colour, religious belief, physical or mental disability, age, gender, sexual orientation, marital status, family status or source of income. All employees are to be treated fairly in all aspects of their employment.

All employees of Genco are employed in accordance with all applicable Law.

Environment

We recognise that our business, although not directly harmful to the environment, encompasses activities which if factored up to an industry wide scale could have a detrimental effect on the immediate, local and global environment, as well as our employees' health. By adopting a 'green' approach where practicable and possible, we can assist in reducing the harmful effects of such activities and in time, reverse undesirable effects

All employees are required to familiarise themselves with the environmental standards that apply to their work.

This policy will be reviewed annually and be adapted if changes to the company occur.

A handwritten signature in black ink, appearing to read 'John Roberts', written over a light grey rectangular background.

John Roberts
Operations Director
Dated: August 2020