Ref	PL/025
Version	1

Code of Conduct

How we behave as individuals really matters, not only in terms of the direct results of our actions but also because our behaviour influences others around us – we all collectively contribute to the Universal Group culture. We all want a positive culture that makes us, as a business and as individuals, successful and ensures we operate in the right way. This code of business conduct is an important pillar of our Universal Group culture.

Our Values

These ensure that we always do the right thing for our colleagues, customers, stakeholders and communities – often going further than just complying with the law and our ways of working.

- **Integrity**. We always behave with integrity towards our customers, colleagues and the communities within which we work.
- **Collaboration.** Our teams collaborate across borders and disciplines to bring our customers the best of Universal Group and to build a stronger business for the future.
- **Excellence.** In all we do, we target excellence. Across all our divisions and disciplines, we strive to deliver to the highest standards.

Conduct Outside of the Workplace

Employees and subcontractors must not engage in conduct outside of work which could seriously damage the reputation and standing of Universal Group, the reputation of other representative or clients of Universal Group or the employee's/subcontractors own reputation.

If an employee/subcontractor is made aware of a concern being raised against them that alleges that they have engaged in behaviour that could potentially compromise their position within the workplace, they should discuss this with the head of their division immediately. In particular, during the course of employment/ subcontract agreement, criminal offences or types of behaviour that involve violence or possession, or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable and could lead to dismissal. If an employee is arrested, convicted, cautioned, charged, or bailed by the Police then they should disclose this to the head of their division immediately. Failure to disclose this information is unacceptable and could lead to dismissal.

Staff must exercise caution when using information technology and be aware of the risks to themselves and others.

Subcontractors/employees must not engage in inappropriate use of social network sites which may bring themselves, Universal Group or our clients into disrepute.



Signed
Richard Lowe
Managing Director

Dated 01/11/2026