

Ethics and Compliance

Lanes Group was founded in 1992 and since then we have been on a journey, growing to 4,000+ employees with a turnover of over £500million. As a large corporate organisation, we retain our purpose of “improving today, for your tomorrow” through the services we provide to our customers and clients across the UK and Ireland.

In delivering on our purpose, we are committed to ethical and transparent leadership, ensuring we always conduct business operations ethically, ensuring understanding and compliance with our responsibilities, including legal requirements.

We have established Group policies that commit to eradicating unethical business practices including bribery, fraud, corruption, and human rights abuse, such as modern slavery and child labour across our operations, including interactions with our value chain.

A successful business is a sustainable one, which ensures a culture of operating in line with its company values. The Lanes Group Values are required to be adhered to by all employees, contractors, and suppliers when interacting with and working with any part of the Lanes Group, including our subsidiary companies across the UK and Ireland.

Acquired businesses are required to adopt this Code and communicate the Lanes Group Values within three months of coming on board. When we enter a joint venture operation, our Code and Values continue to take precedent unless otherwise agreed with the Lanes Group Board of Directors to ensure the highest standard of business integrity and ethics is applied through our operations.

Our Values

Leading

At Lanes Group, we are committed to being industry leaders. This goes beyond simply keeping pace; we aim to set a standard for excellence. Through innovation, proactive thinking, and a constant pursuit of improvement, we aspire not just to follow trends but to shape them.

By cultivating leadership at every level of our organisation, we ensure that our collective expertise propels us ahead, making a lasting impact in our field.

Agile

Agility is ingrained in our approach to navigating an ever-evolving business landscape. We understand the importance of adaptability and swift responses to

change. Our agility allows us to embrace new opportunities, swiftly address challenges, and stay ahead of industry shifts.

By fostering a culture of flexibility and continuous learning, we position ourselves to thrive in dynamic environments, ensuring our operations are not just efficient but also resilient.

Nurturing

At the heart of Lanes Group is a commitment to nurturing growth - both for our organisation and our people. We recognise that sustained success comes from cultivating talent, fostering a positive work environment, and supporting professional development.

By investing in the growth of our employees and creating opportunities for advancement, we build a foundation for long-term success, ensuring that our collective capabilities continually evolve and flourish.

Engaging

Engagement is the cornerstone of our relationships - with our team, clients, and stakeholders. We believe in open communication, collaboration, and building meaningful connections.

By actively involving and valuing the perspectives of all, we create an environment where ideas thrive and innovation flourishes. Our commitment to engagement extends beyond transactions to the creation of enduring partnerships that contribute to the success of everyone involved.

Safe & Secure

Safety and security are non-negotiable aspects of our operations. We prioritise the well-being of our team, clients, and the communities we serve. Through stringent safety protocols, continuous training, and a steadfast commitment to compliance, we create an environment where everyone can work confidently, knowing that their safety is our top priority.

By ensuring a secure foundation, we lay the groundwork for sustained success and the well-being of all stakeholders.

Our Business Conduct

In conducting our business, we ensure that our business relationships are nurtured and avoid causing harm to others via our decision-making processes. At all times we are committed to delivering our operations with respect, honesty, and integrity, and

we will ensure fair treatment of our employees and stakeholders, delivering without discrimination or favour.

At all times Lanes Group reserves the right to avoid business practices that would bring the organisation of its business decisions into disrepute. There is never a good reason to do business unethically and our Group is governed in such a way that if there is anything we see or hear that is illegal, unethical, or unsafe or has the potential to be, we will speak up.

ESG

Our Lanes Group ESG Strategy, Resilient by Nature sets out our commitments for environmental, social and governance issues, which ensures we actively support and promote sustainable operations as well as our corporate social responsibility requirements.

The Lanes Group Resilient by Nature Strategy establishes a nine-point plan, which sets strategic goals aligned with the UN Sustainable Development Goals.

In undertaking an ESG materiality assessment, we have defined our priority areas and our vision.

‘By 2030, Lanes Group strives to attain a significant reduction in our carbon impact through a science-based approach to Net Zero, embrace sustainable sourcing, and champion equality, diversity, inclusion. We are dedicated to transparency, ethical conduct, and community engagement, aspiring to set a benchmark in ESG standards, delivering positive social impact, and fostering enduring shareholder and environmental value.’

Milestone targets are set against the following ESG goal areas.

Environmental	Social	Governance
<ul style="list-style-type: none"> • Environmental solutions • Conserve resources • Net Zero 	<ul style="list-style-type: none"> • Well-being • Inclusion and development • Community impact 	<ul style="list-style-type: none"> • Diverse leadership and stewardship • Value generating partnerships • Sustainable growth and innovation

Compliance

At Lanes Group we are committed to ensure compliance with all applicable laws, regulations, and contract requirements in the delivery of our business operations across the UK and Ireland, and with regard to international requirements.

We are committed to enhancing our knowledge of applicable requirements that not only directly impact on our operations but indirectly through our value chain, ensuring appropriate ethical sourcing of goods, materials and services that support delivery of our activities.

Employee Relations

Employee relations are managed through the Lanes Group People Plan and through our [integrated management system](#), we set our policies, processes and procedures for providing:

- a safe working environment,
- ensuring the competency of our employees through our training, learning, and development processes,
- fair treatment of people, respecting individual rights and fostering an inclusive culture
- provide equal opportunities and non-discrimination throughout your journey at Lanes Group from recruitment, selection, and promotion decisions
- a non-tolerance approach to bullying and harassment
- proactive support to ensure the well-being of our people
- policies and systems that ensure compliance with the Equality Act 2015 and associated employment regulations.

Policies, processes, and procedures are made available to all employees no matter the employment contract type or duration of service through various systems including SharePoint and HR Cascade.

At Lanes Group we provide clear communications to increase engagement and target ongoing positive relations amongst our people, clients, customers, and partners, and it is our expectation that all employees and those working on behalf of any part of the Lanes Group will:

- act in a professional courteous manner
- carry out duties safely, professionally, and effectively and all workwear including PPE is kept suitable, free from damage, is clean, and worn appropriately
- treat others with dignity and respect always, including always acting with dignity and ensuring language is kept clean and always courteous of others
- maintain professional development and understanding of Lanes Group policies, systems, processes, and procedures
- take care of the environment, surroundings, and equipment
- all equipment and parts are only used for tasks intended and are suitably maintained for the task in hand
- maintain and provide a high quality and standard of service

- respect confidential information and maintain a professional manner in communications, including social media platforms
- conflicts of interest that could impact on your obligation to act in the best interests of the Group are declared whether actual or potential
- declare business gifts and entertainment, ensuring only appropriate corporate hospitality is accepted following approval in line with company policy
- refrain from working under the influence of any substance that could impair safety or job performance. The misuse of medication, controlled substances or alcohol and the use of illegal drugs in the workplace is prohibited.

Violations of our Code or the law may have serious consequences for the individuals involved and for the Lanes Group. Anyone found to be engaging in unethical or illegal activities and those who direct, condone, approve, or facilitate such conduct, are acting independently and against the Group's best interests, and will be subject to disciplinary action up to and including termination of employment, as well as possible legal sanctions.

Supply Chain Management

Across Lanes Group we have established a sustainable procurement policy, which sets our policy commitments to drive unethical practices from our supply chain through our procurement decisions and supplier contracts, terms and conditions, and due diligence audits.

In taking forward procurement decisions, it is our commitment to prevent negative impacts on human rights and the environment whilst endeavouring to maximise value and service levels. We will proactively conduct clear and fair procurement processes, payment terms, and work towards developing positive relationships to create value generating partnerships and offer opportunities to local, and micro, small and medium sized organisations.

Lanes Group employees and all those involved in sourcing, supplier selection and supplier management will be educated and trained at the required professional standards.

As a gold member of the Supply Chain Sustainability School, we proactively engage in the supply chain sustainability school to support our own learning and assessment processes and encourage our suppliers to do so also.

We ensure compliance with the Modern Slavery Act 2025 through meaningful action in line with our policy commitment of zero tolerance to slavery, human trafficking, fraud, bribery, or corruption within our supply chain. We do so, by opposing Modern Slavery and understand the specific risks faced by certain sectors including the construction sector, which are known as a target industry for human trafficking. We

are committed to taking all steps to try and eradicate Modern Slavery or human trafficking from our organisation and supply chains.

Our approach is built on a multi-faceted approach known as the "4 P's": Prevent, Pursue, Protect, and Prepare. This approach allows us to address modern slavery comprehensively and effectively.

Privacy, Information Security, and Intellectual Property

We have a duty to safeguard all data and intellectual property entrusted to us. This includes the personal information of employees, customers, clients, and suppliers, as well as all business-critical and confidential data.

Privacy & Data Protection

We comply with all applicable data protection and privacy laws, including the Data Protection Act 2018 and GDPR. Personal and confidential data must only be collected, accessed, stored, and shared for legitimate business purposes and always handled with the highest level of care.

Information Security

All Lanes Group assets, systems, and resources must be used responsibly, solely for their intended business purpose. Employees are required to follow our information security policies, which include the use of secure systems, strong authentication, and data loss prevention measures. Any unauthorised access, disclosure, or misuse of data will not be tolerated.

Intellectual Property (IP)

Intellectual property is a critical asset of Lanes Group. All IP created using Lanes Group materials, resources, or during the course of employment belongs to Lanes Group. Employees must ensure that customer, client, or supplier IP and confidential information are protected with the same controls as our own.

Shared Responsibility

Security and privacy are shared responsibilities. Every individual has an obligation to protect the integrity of Lanes Group data and systems, ensuring that confidential information is only accessed by those with a legitimate need and kept secure at all times.

Competition

Conducting business at Lanes Group will be done fairly in line with competition and anti-trust laws wherever we operate. Our Board of Directors take steps to ensure

compliance with competition law through applying a four-step process to tackle the specific risks we face within our market share. We recognise the benefits of fair competition, enabling innovation, continuous improvement and delivering benefits for our clients and customers.

Understanding

At Lanes Group, we will ensure a consistent understanding of business conduct and ethics across the organisation through communication, training, learning, and development processes.

Accountability

The Lanes Group Board is accountable for ensuring adequate resources and defined responsibilities that foster a culture of positive and ethical leadership, governing and taking responsibility for business ethics and conduct.

Raising Concerns

All concerns, complaints and issues will be handled appropriately; ensuring appropriate level or review or investigation is applied to understand the facts, route cause and avoid repeat occurrence through appropriate corrective action.

All allegations of a breach of our code of conduct will be taken seriously, and we will prohibit retaliation against anyone raising concerns, ensuring concerns are raised in good faith, allowing for review or investigation without bias to determine the facts before decisions are made. The right to appeal against actions following a decision on a breach of code of conduct follows the appeals process as defined by the disciplinary policy.

Whistleblowing

To maintain and ensure ongoing compliance with business conduct standards and our values, we continually promote and manage our operations through ethical leadership. Any deviation away is acted upon and we encourage our people, supply chain and partners to speak up and report issues.

Through the whistleblowing policy we ensure a safe environment for the reporting of unethical practices. Across Lanes Group we have an open and honest approach to reporting issues. All complaints are reviewed and investigated to the highest standards, with appropriate actions being taken to remedy any issues that are upheld.

Relevant Policies

The following policies support our code of conduct.

- Anti-Bribery
- Conflict of Interest
- Corporate Criminal Offence
- Data Protection
- Dignity at Work
- Disciplinary
- Equality, Diversity, and Inclusion
- Grievance
- Information Security
- Modern Slavery & Human Trafficking
- Sustainable Procurement
- Whistleblowing

Supporting Documentation

1. Employee charter and ethical conduct
2. Sustainable supply chain charter and ethical conduct

Wayne Earnshaw



CEO of Lanes Group Ltd
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