



NG Bailey

# CODE OF INTEGRITY

## FOR BUSINESS PARTNERS

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PASSION | INTEGRITY | RESPONSIBILITY | EXCELLENCE

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# Foreword

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Dear Business Partner,

**NG Bailey's business is built on trust. Trust is crucial to both our reputation and our success. A good reputation takes years to build, yet it can be damaged by the conduct of just one of our Business Partners.**

That is why we have created this Code of Integrity for Business Partners, which sets out the minimum standards we expect from all those third parties that we have dealings with.

Integrity is one of our core values and always has been. The NG Bailey board, Group Leadership Team (GLT), and I expect the highest standards of all NG Bailey Business Partners. This Code of Integrity sets the standards you are expected to meet when dealing with NG Bailey. You are also advised to develop your own similar code or policy to cover your dealings with your other Business Partners.

This guidance should not be seen as an exhaustive set of rules but a set of minimum standards against which you should judge your conduct to comply with the spirit of this Code.

Together, we will ensure NG Bailey continues to live its core value of integrity and, in so doing, provide the culture to succeed through passion, integrity, responsibility, and excellence.

◀ **Jonathan Stockton**

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Chief Executive Officer

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# What is the code of integrity?

**This Code sets out the overarching principles that ensure the NG Bailey group of companies (“NG Bailey”) always meets the highest standards of integrity. It addresses issues that, in the opinion of the NG Bailey board and senior management team, are core to NG Bailey maintaining its reputation for integrity and being a trusted company to work with.**

It outlines the standards expected by NG Bailey’s Business Partners when they engage with us. It is not intended to supersede or replace any other business-related or professional codes you may be required to follow. The Code sets out our minimum expectations of our Business Partners whilst working with us, or on our behalf.

Integrity is core to the trust placed in us by customers, clients, shareholders, suppliers, our industry, and our local communities. In simple terms, it is about doing the right thing.

Therefore, it is crucial that all our Business Partners conduct their business with integrity.

## What are the consequences of non-compliance?

**Failure to meet these standards may lead to reputational harm, contract termination or legal penalties for both NG Bailey and the business partner.**

## Who does the Code apply to?

### **This Code applies to:**

- All third parties working for the NG Bailey Group of companies (which includes, NG Bailey Group Limited, NG Bailey Limited, NG Bailey IT Services Limited, NG Bailey Facilities Services Limited, OSM Ventilation Limited and The Freedom Group of Companies Limited). This includes anyone acting for, or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, subcontractors, external consultants, third-party representatives, and suppliers; and
- Any others who act in partnership with or on behalf of NG Bailey and whose conduct will reflect upon NG Bailey.

All Business Partners are responsible for ensuring that this Code is followed and that the standards it sets are met or exceeded.

NG Bailey expects all third parties it works with to work to standards consistent with our own. This Code applies to your dealings with NG Bailey. It is encouraged that you create your own policies and procedures to support compliance with this Code and that you develop your own similar Code or policy to cover your dealings with your own Business Partners.

In some circumstances, NG Bailey will be required to comply with a Code or policy provided by a client or customer, which deals with issues similar to those raised in this Code. If that is the case, you will also be expected to comply with that client or customer’s code/policy, but will be notified in due course.



# How to raise a concern

We are committed to maintaining the highest integrity, transparency and ethical conduct standards. We recognise that our Business Partners are often best placed to observe activities within their operations or their interactions with NG Bailey that may be unethical, illegal, or otherwise improper. Your willingness to raise concerns about such issues is vital for maintaining the integrity of our business relationships and upholding our shared values. Our [Speak Up \(whistleblowing\) policy](#) encourages all Business Partners to report any misconduct or inappropriate behaviour they observe or suspect.

We encourage our Business Partners to Speak Up if you observe or suspect misconduct or inappropriate behaviour that could impact NG Bailey, our values, policies, or the law. Examples of concerns include, but are not limited to:

- Fraud
- Discrimination or harassment
- Violation of competition laws and rules
- Inadequate financial or non-financial record-keeping
- Conflicts of interest
- Bribery
- Slavery and human trafficking (anti-slavery and human trafficking policy and modern slavery statement)
- Environmental, health and safety issues
- CCO policy
- Regulatory breaches
- Improper use of company resources
- Disclosure of confidential information
- Inappropriate use or receipt of gifts, hospitality and donations
- Non-compliance with our values, policies, procedures and/or processes
- Wrongdoing to customers, stakeholders or employees.

**We understand that raising concerns can be sensitive. Therefore, we provide several channels for our Business Partners to Speak Up:**



## Step one

Raise a concern by contacting your primary point of contact within NG Bailey. This should be your procurement team representative or the day-to-day business owner who manages your relationship.



## Step two

If you are uncomfortable raising the issue with your direct contact, or if you believe the concern is not being adequately addressed, you can report using one of the following methods:

- Call the hotline:
  - UK - Call 0800 915 1571
  - Cyprus - Call 00800 7233 2255
  - Germany - Call 00800 7233 2255
- Visit the website: [www.safecall.co.uk/ngbailey](http://www.safecall.co.uk/ngbailey)
- An independent third party administers our Speak Up hotline and website and is available 24 hours a day, 7 days a week, and 365 days a year.
- Alternatively, contact us internally via [concerns@ngbailey.co.uk](mailto:concerns@ngbailey.co.uk)







# How to raise a concern (continued)

When raising a concern (in person, by phone or online), please provide as much detailed information as possible to enable NG Bailey to assess and investigate your concern. This could include:

- The background, history and reason for concern
- Names, dates, places and other relevant information such as project/contract details, and/or any documents that may support your report.

NG Bailey encourages you to Speak Up as soon as possible to address concerns and maintain a positive and ethical work environment. Addressing issues early allows us to take prompt action and prevent escalation. Speak Up with the facts available to you, even if you do not have all the facts. You are not expected to prove that your concern is well-founded. NG Bailey will investigate to determine if there is reason for concern.

NG Bailey is committed to handling all reports with confidentiality, sharing information only with those who need to know to investigate and address the concern. We also have a strict zero-tolerance policy for retaliation against anyone who raises a genuine concern. We expect our Business Partners to uphold similar principles within their own organisations and ensure that individuals who Speak Up about concerns related to our business relationship are not subjected to any form of reprisal.

NG Bailey takes all potential misconduct seriously. We will review the information provided and determine the appropriate course of action, which may include an internal investigation. While we may not be able to share the full details or outcome of an investigation due to confidentiality and legal reasons, we are committed to addressing genuine concerns appropriately.

Any personal data obtained as part of this Speak Up policy will only be used for the purposes explained in this policy, to comply with the law or an important public interest.

# Working conditions

**Business Partners must treat all workers with dignity and respect and provide a safe and healthy working environment. You must comply with all applicable laws regarding working conditions, including, but not limited to, worker health and safety, sanitation, fire safety, risk prevention and electrical, mechanical, and structural safety. In addition, you must meet the following standards:**

## Health and safety

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**NG Bailey strives to reduce risks and protect our people, as well as the communities and environments in which we work. Working in our industry carries a high level of risk, so safety is always a top priority for us, and we have successfully built a culture where safety really does come first.**

Being safe and keeping our people safe and well is what our Safety First & Foremost principle is all about, and we expect the same from all those who work with us and on our behalf. Our Safety First & Foremost mission statement and health and safety policy statement are available on our website, [www.ngbailey.com](http://www.ngbailey.com).

Our expectation is that our Business Partners operate in line with these principles and raise any queries or concerns via our MySafety electronic reporting platform or anonymously via the Speak Up hotline (please see section three for details).

NG Bailey continuously strives to develop new, safer, and healthier methods of delivery. Our Don't Walk By approach encourages everybody working on our behalf to report any safe/unsafe acts or conditions. Please speak with your local Safety, Health & Environmental Advisor on how to do this.

## Drugs and alcohol

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**In line with our Safety First & Foremost principle, NG Bailey has a firm legal commitment to its employees to provide a safe work environment and to its customers to provide a high-quality product and level of service. The possession, sale, use, transfer or manufacture of alcohol, illegal drugs, controlled substances or abuse of prescribed medicines poses an unacceptable risk to safe and efficient operations. For these reasons, NG Bailey strives to achieve and maintain a substance and alcohol-free workforce and be an employer of choice.**

Employees, contractors, and subcontractor personnel will be tested for illegal substances and the abuse of other substances or alcohol as outlined in the NG Bailey Drug and Alcohol procedure and covered by a variety of criminal and civil legislations. All results and information in relation to drug and alcohol testing will be dealt with in strict confidence.

The full NG Bailey Drug and Alcohol procedure is available on request.







## Wellbeing

**Wellbeing is a blend of the physical, psychological, social and relationship aspects of everybody's working lives. Mental and physical ill health are interdependent, can affect anyone and will impact their overall well-being. Good mental and physical health are broadly categorised as follows:**

- Mental health - A state of well-being in which every person realises their potential, can cope with the everyday stresses of life, can work productively, and can engage in their local community.
- Physical health – Maintaining a healthy and balanced diet, exercising regularly, maintaining a healthy weight, and limiting harmful behaviours, e.g., smoking, excessive alcohol consumption and the use of illegal substances.

We all have a current state of mental and physical health, whether that be positive or negative and at different points in life, these states can change. NG Bailey is committed to creating a culture and workplace environment that promotes the overall well-being of all our people, including those working with us and on our behalf.

For those outside our organisation who may be working on our behalf, NG Bailey supports The Lighthouse Club and their Construction Industry Helpline in providing emergency support for those in need in our industry. Those calling the helpline will need to comply with the following criteria:

- Be currently working or a former worker in the construction industry or allied trades; or
- An apprentice to a construction trade

Those in need can contact the Construction Industry Helpline via telephone (UK 0345 605 1956 or ROI 1800 939 122), online ([www.constructionindustryhelpline.co.uk](http://www.constructionindustryhelpline.co.uk)) or via their app, which can be downloaded from the Apple or Google Play Store.

## Fair pay

**You must ensure that workers are paid at least the applicable minimum legal wage via PAYE and provided with all legally required benefits. You must also pay overtime or incentive rates that are at least as high as those required by law.**





# Modern slavery

NG Bailey is fully committed to compliance with the Modern Slavery Act 2015, not only in its own dealings but also with regard to its Business Partners. Our Anti-Slavery and Human Trafficking Policy along with NG Bailey's Modern Slavery Statement are available on its website. As a Business Partner of NG Bailey, you are required to familiarise yourself with our policy and to comply with all requirements with the intention of reducing the risk of modern slavery in your own business and that of your own supply chain. NG Bailey has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships.

We encourage all suppliers and subcontractors to register with the Supply Chain Sustainability School. Registration is free and gives you access to a host of information and training relating to ESG topics, including modern slavery". <https://www.supplychainschool.co.uk/about/membership/>

## You shall not:

- Permit or allow the use of forced, compulsory or trafficked labour or anyone held in slavery or servitude, whether adults or children and whether within your own business or that of your suppliers

## You shall:

- Take active steps to reduce the risk of modern slavery in your own business and that of your suppliers and supply chain; and
- Ensure compliance with the requirements of NG Bailey's Anti-Slavery and Human Trafficking Policy

## You should:

- Undertake any disclosure or prequalification process required of NG Bailey's supply chain; and
- Raise any concerns to us about any issue or suspicion of modern slavery in any parts of your business or supply chain of any supplier tier at the earliest possible stage in accordance with the provisions of the Anti-Slavery and Human Trafficking Policy or section three of this document.







## Fairness, inclusion and respect

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**Everybody should be treated, and should treat each other, with dignity and respect whilst at work. We expect our Business Partners to comply with all applicable laws concerning employment opportunity and discrimination to provide a workplace free from discrimination and harassment.**

We have a zero-tolerance approach to verbal, physical and other forms of abuse occurring anywhere in our operations. Abuse relating to (but is not limited to) the nine protected characteristics, as detailed in the Equality Act, will not be tolerated, and we expect our Business Partners to ensure they have appropriate policies, procedures and resources in place to ensure that all their employees can operate in line with these expectations.

NG Bailey is committed to becoming a more inclusive organisation focused on embedding fairness and respect in everything we do and being much more representative of society as a whole. We value diversity in our employees, customers and Business Partners.





# Anti-bribery and Corruption

NG Bailey is committed to conducting business with the utmost honesty, integrity and ethical standards. This commitment extends to preventing all forms of bribery, corruption, and fraud throughout our operations and supply chain. We require our Business Partners to adhere to the same high standards. You must not engage in any conduct on our behalf that we would not engage in directly.

Bribery and corruption are criminal offences in most countries where we and our Business Partners operate. Such acts can expose all parties to significant risks, including prosecution, substantial fines, imprisonment and severe reputational harm.

Under the UK's Economic Crime and Corporate Transparency Act 2023 (failure to prevent fraud offence), NG Bailey can be held liable for any fraudulent activities committed by our Business Partners to benefit NG Bailey. This legislation reinforces the importance of robust procedures to prevent fraud.

All Business Partners must comply with our Gifts, Hospitality, Donations and Sponsorship Policy.

## Financial integrity and record keeping

**Business Partners must record and report information accurately, honestly and objectively. You must keep accurate financial and business records, submit proper invoices and maintain books and records in accordance with all applicable laws and regulations. You may not make any false or inaccurate entries in any books and records related to dealings with NG Bailey.**

## Fraud - Failure to prevent fraud offence

**For the purposes of this Code, fraud is defined as any deliberate act intended to secure an unfair or unlawful gain, or to cause loss to another party, through deception or other dishonest means. This includes both instances where NG Bailey is the victim (inward fraud) and where a Business Partner, or someone acting on our behalf, engages in fraudulent activities that could benefit NG Bailey (outward fraud).**

Specifically, in our relationship with you, our Business Partners, you are considered an "associated person." This term encompasses all individuals, including directors, employees, agents, contractors, suppliers, subsidiaries, and alliance partners performing services for or on our behalf. This means that:

- Your actions can create a risk for NG Bailey. If your employees, subcontractors, or anyone acting on your behalf engages in fraudulent activities to benefit NG Bailey (even indirectly, such as securing a contract with us through dishonesty), NG Bailey could be held liable for failing to prevent that fraud.
- Our expectations extend to your conduct. You must have your own robust measures in place to prevent fraud within your organisation and in your dealings with us. This helps protect both your business and NG Bailey from potential legal and reputational risks.



## Fraud - Failure to prevent fraud offence (continued)

We expect all Business Partners to actively contribute to the prevention of fraud. This includes:

- Implementing and maintaining your own effective anti-fraud measures that align with our commitment to ethical conduct, ensuring that your own operations are free from fraud and corruption.
- Having policies, procedures and controls in place to detect and prevent fraudulent activities within your organisation and supply chain.
- Carefully vetting your own employees and subcontractors to minimise the risk of fraud.
- Being vigilant in identifying and mitigating potential fraud risks within your operations and interactions with NG Bailey.
- Ensuring your employees and anyone working on your behalf comply with all applicable anti-fraud laws and regulations.
- Promptly reporting any suspicions or instances of fraud via the Speak Up (Whistleblowing) service, whether internal or external, that could involve or impact NG Bailey (see section three).

In summary, as our Business Partner, you are an “associated person”, and any fraudulent activities can have direct consequences for NG Bailey under this legislation. Your commitment to preventing fraud within your operations protects your business and safeguards NG Bailey from potential repercussions arising from the actions of our associated persons.

## Tax - Corporate criminal offence (CCO)

**NG Bailey takes its tax responsibilities extremely seriously and is committed to meeting its statutory tax obligations. NG Bailey is committed to conducting our business in a law-abiding and ethical manner. It has a zero-tolerance approach to tax evasion and acts of criminal facilitation of tax evasion by its employees, subcontractors or suppliers.**

This means we expect all our employees and anyone who works for us not to engage in any activity which evades tax or facilitates or may facilitate the evasion of tax by any other person (company or individual). It does not matter whether the taxes are UK taxes or are due to an overseas fiscal authority. Nor will we engage with any third party (including those who contract with us or otherwise provide services to us) who do not approach compliance in a similar way.

You must comply with all relevant laws and regulations both in the UK and overseas (including but not limited to Part 3 of the Criminal Finances Act 2017). You must not offer or facilitate any form of tax evasion.

You must have and maintain policies and procedures that are reasonable to prevent the facilitation of tax evasion by another person (including employees of the Business Partner, any authorised subcontractors and any associated persons) in accordance with section 47 of the Criminal Finances Act 2017.

We expect all of our Business Partners to report suspected non-compliance with this policy via our Whistleblowing process, as outlined in section three above.







## Business gifts and hospitality

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**Business Partners may not provide, attempt to provide, offer, or solicit anything of value, directly or indirectly, to obtain or reward favourable treatment in connection with any transaction on our behalf. You must ensure that any business courtesies, tokens of appreciation or meals and invitations to entertainment activities cannot reasonably be construed as an attempt to secure unfair preferential treatment.**

NG Bailey Business Partners should not offer, and NG Bailey employees should not accept any gift that could be seen as a bribe or an attempt to improperly influence a business relationship. Entertainment activities and gifts should be modest in price and uncommon in frequency. Gifts of cash or cash substitutes are never acceptable. As a general guideline for evaluating whether a business courtesy is appropriate, you should consider whether public disclosure would be embarrassing to you personally, your organisation, NG Bailey or any third party. For more information please consult your local NG Bailey contact for further details regarding our Gifts, Hospitality, Donations and Sponsorship policy.

## Kickbacks

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**Business Partners must not offer, promise or provide any NG Bailey employee, or any member of their family, with any personal benefit - kickback, favour, cash, gratuity, entertainment or anything else of value - in order to obtain favourable treatment from us.**

## Political or charitable donations

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**Business Partners are not authorised to make any type of political contribution or charitable donation, be it money, goods or services on behalf of NG Bailey.**



# Intellectual property and confidential information

Business Partners are expected to protect NG Bailey's intellectual property rights and our proprietary and confidential information. You must maintain the confidentiality of our trade secrets and other proprietary information and keep confidential the information entrusted to you by NG Bailey according to this Code and your individual agreements with us, except when disclosure is authorised by NG Bailey or mandated by law.

## Conflicts of interest

**Business Partners may not enter into a financial or other relationship with an NG Bailey employee that creates any actual, potential, or perceived conflict of interest. A conflict of interest arises when the personal interests of an NG Bailey employee are inconsistent with the responsibilities of his or her position with our group. Even the appearance of a conflict of interest can be damaging to NG Bailey, to you, and to the employee and must be disclosed and approved in advance. You must make us aware of any potential or actual conflicts of interest.**

## Working with Government Classified Information and holding an NG Bailey sponsored National Security Clearance

**The NG Bailey group of companies takes the security of all its customers and Business Partners very seriously.**

All our supply chain and partners who are provided any classified material or have a United Kingdom National Security Vetting (UKSV) clearance sponsored by NG Bailey are to be aware that they are obliged to adhere to the provisions of the National Security Act 23 and the provisions of the Official Secrets Act 1989. Details can be found in [ISN 2024/03 National Security Act 2023](#).

You should take all reasonable steps to make sure that all individuals employed on any work in connection with a Government project have notice of the above-specified aspects and that the statutory provisions apply to them and will continue to apply after completion or earlier termination of the contract.

NG Bailey expects its supply chain to:

- Ensure that the provided project security instructions, flowed down the supply chain are adhered to
- Ensure the protection of Government classified information, when storing and transmitting in accordance with current guidance (Government Security Classifications)
- Ensure that all personnel maintain their required security clearance as specified by NG Bailey.
- Ensure that you have in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing, disclosure, or destruction of classified data. Notify NG Bailey immediately of any security breach (or suspected breach), concerns or suspected weaknesses without delay.

If you have any questions relating to any of the above, please contact the local NG Bailey project security custodian or our central security team ([security@ngbailey.co.uk](mailto:security@ngbailey.co.uk)).





# Privacy and GDPR

**The NG Bailey group of companies takes the privacy of all its customers and Business Partners very seriously and endeavours to take appropriate care of any data disclosed to us. All our supply chain and partners are obliged to manage data in line with the General Data Protection Regulations and Data Protection Act 2018, and to the extent you process personal data on our behalf, your obligations are contained in our supplier data processing addendum.**

NG Bailey expects its supply chain to:

- Ensure that personal data is kept secure and confidential
- Ensure that personal data is collected and processed in accordance with data protection legislation (including the data protection principles)
- Where required, have appropriate contractual agreements and clauses in place concerning data protection
- Ensure that you have in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
- Notify NG Bailey immediately of any data breach concerning NG Bailey's data; and
- Maintain accurate and up-to-date records in regard to any data processing.

The below NG Bailey privacy notices explain what personal information we may collect about your employees, representatives and other individuals for whom you control or process their personal information, how we may use it, and the steps we take to ensure that it is kept secure, and which also explain the rights of such individuals in respect of their personal data, and which are available to view in their latest form on our website [www.ngbailey.com](http://www.ngbailey.com).

- Privacy Notice for Business Partners
- Privacy Notice for Website and Digital Platform Users
- Privacy Notice Addendum for Dayforce Clocks.

## IT and cyber security

**NG Bailey requires organisations to maintain and, when requested, provide details of its appropriate IT and cyber security protection and controls to guard against cyber-attack and the loss of sensitive and/or commercial data.**

Should your organisation discover a breach or experience a major cyber event, you should immediately contact your primary NG Bailey representative, providing details of any risk and/or impact to NG Bailey.



# Environmental

NG Bailey is committed to conducting our business in an environmentally responsible manner and minimising our environmental impact. We take seriously the impact of our business operations on the environment and natural world, and we expect the same standards from our Business Partners.

Our environmental policy statement and responsibility policy are both available in full for your consideration on our website at [www.ngbailey.com](http://www.ngbailey.com).

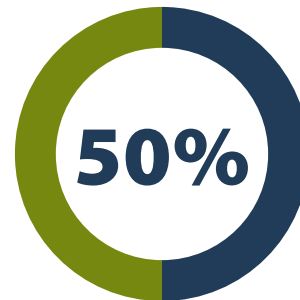
As a minimum, we expect our Business Partners to comply with all relevant legislation, rules and regulations that pertain to the environment, but are encouraged to exceed legally mandated standards where possible.



**As a Group we have set challenging science-based targets to reduce our own direct carbon impacts.**

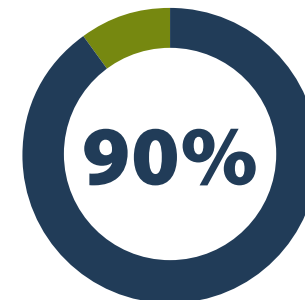
From a baseline year of 2018/19 we are committed to:

**Reduce our**  
own direct carbon  
(Scope 1 and 2)  
impacts by...

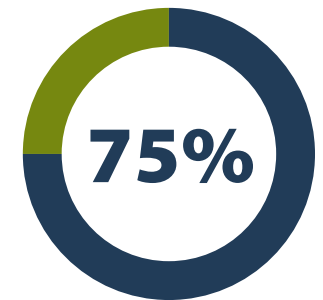


**by 2031**

**Reduce our** total  
carbon footprint  
(scope 1, 2 and 3)  
by...



**by 2045**



(by spend) of our  
purchased goods  
and services and  
capital goods  
providers, have  
joined us on the  
**carbon reduction  
journey by 2027.**





# Environmental continued...

**This sets a clear direction for our journey to net zero in 2045 and as a result, we expect our suppliers and subcontractors to:**

- Be able to demonstrate that you have either set or are working towards setting near and long-term carbon reduction targets (the "Targets") that incorporates all relevant corporate entities and addresses your direct and indirect impacts (a specific SME route is also available). Our preference is that you set Targets through the Science Based Target Initiative ("SBTi") or if not, an alternative, which uses a consistent carbon data capture and assessment methodology with a clear action plan. Where SBTi is not used, then Targets must be approved by us. We will expect you to work collaboratively with us and provide us annually with your carbon emission data and routinely update us with progress against the Targets. Please refer to an introductory message from our Board. [Supply Chain Science Based Targets](#).
- Manage your activities to minimise negative environmental impacts including (but not limited to) pollution, waste, water, carbon and exercise consideration for biodiversity and sensitive environments. Some of the projects that we are asked to deliver exist in highly biodiverse or sensitive environments. We expect our Business Partners to operate accordingly in these environments.
- Share details of environmental performance including (but not limited to) carbon, energy, waste and biodiversity. We may ask you to record and report this data to us on a scheduled basis
- Share details of your environmental impacts with us so we can understand the environmental impact arising from our procurement. Where impacts are significant, we will ask you to examine ways in which this impact will be reduced.
- We will work with suppliers to understand how changes can be applied to the delivery of your goods and/or services with regard to our business. The review of this information and data may form part of the regular reviews undertaken as part of our supply chain management approach.

## **In addition we also ask you to consider the following:**

- Maintain a documented process for identifying and managing your significant environmental aspects and impacts. If possible, demonstrate certification to a common standard, such as ISO 14001.
- The environmental impacts of products or services provided potentially as a company/group or potentially on a per project basis. In some cases we may request specific data and details such as environmental product declarations to support our client requirements. This includes taking steps to understand and minimise the environmental impacts relating to the products or services provided, and where practicable, working to reduce these impacts.
- The traceability of materials used - We expect our suppliers to respect restrictions or bans on specific materials and adhere to appropriate regulations to ensure that materials and products delivered to us have a non-controversial origin and are correctly traceable. 100% of timber supplied must be certified FSC (Forest Stewardship Council) or PEFC (Programme for Endorsement of Forest Certification) certified.
- Initiatives or opportunities for collaboration and innovation that present an opportunity to positively impact the environment through the products or services provided are always welcomed, e.g., implementing the waste hierarchy; establishing a circular economy, reducing packaging, using materials with high recycled content or sourcing locally are all encouraged.



# Social Value

## What is Social Value?

Social Value refers to the broader economic, social, and environmental impacts generated by an organisation and its employees through the way they operate and deliver services. It extends beyond compliance or financial performance to consider how business activities contribute to the long-term well-being, inclusion and resilience of individuals, communities and wider society.

## Why is it important?

As a result of the Social Value Act, government-related procurement must now demonstrate impact beyond the immediate purchase of goods and services. Increasingly, this expectation is also now being extended to non-government procurement, with organisations placing a greater emphasis on delivering social value.

Many of our customers now develop a tailored series of Key Performance Indicators (KPIs) that align with their social value priorities and encourage investment in local communities. These KPIs are often linked to commercial outcomes, including financial incentives or penalties, to ensure meaningful and accountable delivery of social value commitments.

## What are the KPIs?

KPIs cannot be delivered by one organisation in isolation, therefore there is an obligation on all involved parties to contribute towards the delivery of the social value KPIs. Social Value is created through a wide range of activities, which will vary depending on the priorities of each client and project. There are hundreds of potential KPIs across multiple frameworks and as a supplier, you may be asked to contribute towards these KPIs as part of your engagement with us. These contributions may include, but are not limited to:

- Supporting continuous learning and upskilling within your organisation
- Provide fair work opportunities to local populations, including underrepresented or disadvantaged groups (e.g., long-term unemployed, young people, ex-military)
- Engaging with local educational institutions to share insights and experiences from your career
- Offering meaningful work experience opportunities for school-age children and young adults
- Offering apprenticeships, training, and skills development.
- Contributing time and skills to local community initiatives, for example volunteering at a homeless shelter or promoting education as a STEM Ambassador

If you have any questions relating to any of the above, please contact the local NG Bailey project security custodian or our central security team ([security@ngbailey.co.uk](mailto:security@ngbailey.co.uk)).

## Taking part in a social value activity

**It is essential that any social value activities are accurately recorded. Our social value team may be in contact to discuss specific project requirements.**

Please be prepared to discuss your capability and provide evidence in support of any relevant activity. Our customers may reserve the right to audit the activities taking place in support of social value KPI as part of contractual obligations.

If taking part in any social value activities, your local Social Value representative will request the necessary supporting information to verify and report on the outcomes.





# Document history

## Document owner and approval

The Head of Responsibility is the owner of this document and is responsible for ensuring that this policy is reviewed in line with legislation as well as emerging best practice.

A current version of this document is available to all employees on the NG Bailey intranet. It does not contain confidential information and can be released to relevant external parties.

This policy is issued on a version controlled basis under the signature of the Chief Executive Officer.

Date: August 2025

**Jonathan Stockton**  
Chief Executive Officer  
For and on behalf of the Board of the Company

Document Amendment Summary				
This document is published as a controlled document but will be uncontrolled once downloaded or printed. The document will be reviewed periodically.				
Issue Date	Version	Author	Approved by	Details of Changes
April-18	1.0	Natalie Wilkinson	David Hurcomb	Policy refreshed
June-22	2.0	Natalie Wilkinson	David Hurcomb	Full policy refresh
May-2023	3.0	Natalie Wilkinson	David Hurcomb	Addition of section 6.4 and update to registered address
July 2025	4.0	Natalie Wilkinson	Jonathan Stockton	Full policy refresh

Issue Date	Version	Review Date	Author	Owner	Pages
Apr-18	1.0	Apr-19	Natalie Wilkinson	David Hurcomb	11
June-22	2.0	May-24	Natalie Wilkinson	David Hurcomb	16
August-25	3.0	July-27	Natalie Wilkinson	Clare Salmon	19
Review Date is 2 years from Issue Date			Retention Period is 5 years from Review Date		





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