

Code of Conduct



Introduction

At Sureserve, how we conduct ourselves is just as important as the services we provide. Every day, our customers, residents, suppliers, partners and communities place their trust in us. Maintaining that trust depends on each of us acting safely, responsibly and ethically in everything we do.

This Code of Conduct sets out the standards and behaviours expected of everyone working for and on behalf of Sureserve. It explains how our values of Safety, Excellence, Respect, Integrity, Expertise and Sustainability guide our decisions, actions and relationships.

The Code applies to everyone working for or on behalf of Sureserve. It helps us make sound decisions, comply with our legal and regulatory obligations, and maintain the high standards expected by our customers, colleagues and stakeholders.

Every one of us is responsible for understanding and following this Code, exercising good judgement, seeking guidance when needed, and speaking up if something does not seem right. Together, by living our values and following the principles set out in this Code, we can continue to build a business that is trusted by customers, respected by communities and valued by our people.

Our Responsibilities under the Code of Conduct

Every person working for or on behalf of Sureserve is expected to:

- Understand and follow this Code and all relevant company policies.
- Act with honesty, integrity and professionalism at all times.
- Comply with applicable laws, regulations and contractual obligations.
- Treat colleagues, customers, residents, suppliers and communities with respect.
- Protect Sureserve's assets, information and reputation.
- Raise concerns promptly if they become aware of conduct that may breach this Code, company policies, or the law.
- Cooperate fully and honestly with investigations, audits, compliance reviews and workplace enquiries.
- Seek guidance from their manager, Human Resources, Compliance, or Legal teams whenever they are unsure how to proceed.

Leaders and managers have additional responsibilities to:

- Promote awareness and understanding of this Code within their teams.
- Lead by example and demonstrate the behaviours expected under this Code.
- Encourage an open culture where concerns can be raised without fear of retaliation.
- Foster an environment where colleagues feel safe and supported to speak up.
- Take concerns seriously and address them promptly, fairly and appropriately.
- Never discourage colleagues from raising concerns or seeking guidance.
- Take appropriate action where potential breaches are identified or reported.
- Ensure colleagues have access to the policies, guidance and training necessary to meet their responsibilities.

Vision and Values

Our Vision is to *“To play a vital leadership role in the decarbonisation of the social housing and related public sector and to contribute in a significant way in alleviating fuel poverty.”*

Our Values guide behaviours and what we can expect from one another:



Safety



Excellence



Respect



Integrity



Expertise



Sustainability

Who this Code Applies To

This Code of Conduct applies to everyone working for or on behalf of Sureserve Group Ltd and its subsidiaries, including employees, directors, agency workers, apprentices, contractors, consultants, temporary workers, and third parties acting on our behalf across all Sureserve businesses incorporating:

- **Compliance:** Sureserve Compliance Holdings Ltd, Sureserve Compliance Central Ltd, Sureserve Compliance Fire Ltd, Sureserve Compliance North Ltd, Sureserve Compliance Northwest Ltd, Sureserve Compliance South Ltd, Sureserve Compliance Water Ltd, Swale Heating Ltd.
- **Energy Services:** Sureserve Energy Holdings Ltd, Sureserve Energy Services Public Buildings Ltd, Sureserve Energy Services Meters Ltd, Sureserve Energy Services North Ltd, Sureserve Energy Services UK Ltd, Hillside-Infinitas Ltd, Sureserve Energy Services South West, Sureserve Energy Services Wales Ltd
- **Electrical:** Sureserve Compliance Electrical Holdings Ltd, Sureserve Compliance Electrical Ltd, R. Dunham (UK) Ltd, Sureserve Compliance Electrical North Ltd.
- **International:** Bonarius Vastgoed B.V.

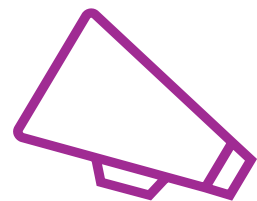
We expect all individuals covered by this Code to uphold its principles and act in a manner that reflects our values, protects our reputation, and supports a safe, inclusive and ethical working environment.

Breaches of the Code

Failure to comply with this Code, associated policies, or applicable laws and regulations may result in colleagues facing disciplinary action, including dismissal, and potential legal action.

Reporting Concerns

Sureserve is committed to maintaining an open, honest and ethical culture where people feel able to raise concerns without fear of retaliation. If you become aware of, are asked to participate in, or suspect any activity that may breach this Code, company policies, or the law, you have a responsibility to speak up.



In most cases, concerns should first be raised with your line manager. If you do not feel comfortable doing so, if the concern involves your manager, you should raise it with Human Resources, the legal team, or another appropriate manager.

If you do not feel able to raise a concern through normal management channels, you can contact our Confidential Reporting Hotline:

ssg.whistleblower@sureserve.co.uk

Such concerns can be reported anonymously - however, it is helpful if you are willing to provide your name and how you can be contacted as this may assist in the investigation of the issue raised. We may use the Confidential Reporting Hotline system to raise questions with you to clarify any issues, or to allow you to review updates on the outcome of the investigation.

No Retaliation

We support honest and open communication and encourage everyone to ask questions and report concerns. We do not tolerate retaliation, and consider it to be serious misconduct. Retaliation can take many forms, for example: intimidation, threats, humiliation, and raising issues maliciously or in bad faith. Always speak up if you think that you or someone you know has experienced retaliation.

Safety

Ensuring the safety and well-being of our team and residents is our utmost priority

Health and Safety

Why does this matter?

Safety is fundamental to everything we do. Everyone should be able to work, visit, or receive our services safely. Accidents and injuries can have life-changing consequences for individuals and their families, as well as impacting our customers, reputation and ability to deliver services. By putting safety first, we protect people, maintain trust and support the success of our business.



What does this mean for you?

You must:

- **Work safely at all times** and follow all applicable health and safety laws, company policies, procedures and site rules.
- **Take responsibility for safety** by considering how your actions may affect colleagues, customers, residents, contractors and members of the public.
- **Complete required training** and ensure you understand the risks associated with your role and the controls in place to manage them.
- **Use equipment, tools and personal protective equipment (PPE) correctly** and ensure they are maintained, stored and used in accordance with company requirements.
- **Report unsafe conditions, incidents and near misses promptly** so that appropriate action can be taken and lessons can be learned.
- **Challenge unsafe behaviours** and stop work where there is a risk of harm.
- **Speak up about safety concerns** and identify opportunities to improve health and safety.
- **Cooperate with investigations and audits** and support actions that improve safety performance and prevent reoccurrence.

Drugs and Alcohol

Why does this matter?

Drugs or alcohol can impair judgement and performance, putting you, your colleagues, residents and the public at risk. Maintaining a workplace free from drugs and alcohol is essential to protecting safety, delivering quality services and maintaining trust.



What does this mean for you?

You must:

- **Never work whilst under the influence** of drugs, alcohol or any other substance that may impair your ability to carry out your duties safely and effectively.
- **Be fit for work** by reporting for duty capable of performing your role safely and effectively.
- **Comply with testing requirements** if you are required to undergo drug or alcohol testing.
- **Disclose relevant medication** by informing your manager of prescribed or over-the-counter medication that may affect your ability to undertake your duties safely.
- **Report concerns about drug or alcohol misuse** to your manager or HR if you believe a colleague may be working under the influence of alcohol, illegal drugs or another substance.
- **Seek support early** from your manager, HR or a professional if you are experiencing issues relating to drugs or alcohol, support is available.

Excellence

Excellence is embedded in our way of working, reflecting our unwavering commitment to delivering outstanding service.

Committed to Our Customers and Residents

Why does this matter?

Our customers and residents are at the heart of everything we do. The services we provide help keep homes, buildings and communities safe, compliant, warm and energy efficient. By understanding the needs of our customers and delivering services to a consistently high standard, we build trust, strengthen relationships and create lasting value.



What does this mean for you?

You must:

- **Treat people with respect** by acting professionally, courteously and compassionately at all times.
- **Deliver reliable services** by carrying out your responsibilities to the highest standards of quality and professionalism.
- **Communicate clearly and honestly** with customers, residents, colleagues and business partners.
- **Respond to concerns appropriately** by listening and helping to find a fair resolution.
- **Support accessibility and inclusion** by helping ensure our services are accessible and responsive to the diverse needs of the communities we serve.
- **Protect customer trust** by acting with integrity and safeguarding customer information.
- **Identify opportunities to improve** by sharing feedback, lessons learned and ideas that enhance customer experience and service delivery.

Delivering Quality Services

Why does this matter?

The quality of our work underpins the trust that customers, residents and partners place in Sureserve. By delivering services safely, professionally and to a consistently high standard, we protect our reputation, meet our commitments and create lasting value for the communities we serve.



What does this mean for you?

You must:

- **Deliver quality work** by meeting the expected standards and taking pride in your delivery.
- **Follow approved policies and procedures** and comply with applicable technical, operational and regulatory requirements.
- **Maintain professional competence** by completing required training and keeping your skills and knowledge up to date.
- **Use sound professional judgement** and seek guidance where you are unsure.
- **Report defects and non-conformities** promptly so issues can be fixed and lessons learned.
- **Take ownership** to address issues within your control and deliver on your responsibilities.
- **Drive continuous improvement** by identifying opportunities to improve quality, efficiency and service delivery.

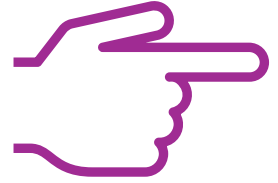
Respect

Treating everyone with respect is fundamental to our identity and values.

Bullying and Harassment

Why does this matter?

Everyone should be treated with dignity, respect and fairness. Bullying, harassment and victimisation can harm individuals, undermine teamwork and create an unsafe and unwelcoming workplace. We do not tolerate any form of inappropriate behaviour, including intimidating, offensive or insulting conduct, spreading malicious rumours, deliberately excluding others, making derogatory comments or jokes or any actions intended to humiliate, upset or undermine another person.



What does this mean for you?

You must:

- **Treat others with dignity and respect** at all times, regardless of role, background or personal characteristics.
- **Never engage in bullying, harassment or victimisation** or any behaviour that could reasonably be considered intimidating, offensive, degrading or humiliating.
- **Consider the impact of your words and actions** and recognise that behaviour may be perceived differently by different people.
- **Promote an inclusive workplace** where everyone feels welcome and valued.
- **Speak up** if you witness inappropriate behaviour and support affected.
- **Report concerns promptly** to your manager, Human Resources or another appropriate reporting channel if you experience or witness bullying, harassment or victimisation.

Diversity, Equity and Inclusion

Why does this matter?

A diverse and inclusive workplace strengthens our business, encourages innovation and helps us better understand and serve the communities in which we operate. We value different backgrounds, experiences, perspectives and ideas, and are committed to providing equal opportunities where people are treated fairly and recognised based on their skills, performance and potential.



What does this mean for you?

You must:

- **Treat everyone fairly and respectfully** regardless of their background, identity, beliefs or personal characteristics.
- **Promote an inclusive workplace** where everyone is valued, supported and able to contribute.
- **Listen to different perspectives** and remain open to new ideas, experiences and viewpoints.
- **Make decisions fairly** by assessing people based on merit, skills, qualifications and performance.
- **Never discriminate against any individual** or tolerate discriminatory behaviour.
- **Support equal opportunities** and help create an environment where everyone can develop and succeed.
- **Report concerns promptly** if you witness or experience discrimination, exclusion, harassment or behaviour that is inconsistent with our values.

Safeguarding

Why does this matter?

Many of our colleagues work in customers' and residents' homes and may come into contact individuals who are vulnerable due to age, disability, illness, mental health, financial circumstances or personal situations. We all have a responsibility to recognise signs of abuse, neglect, exploitation or harm, act appropriately and report concerns, while treating everyone with dignity and compassion.



What does this mean for you?

You must:

- **Maintain professional boundaries** when working in residents' homes and avoid any behaviour that could be perceived as inappropriate, exploitative or intrusive.
- **Remain alert to potential safeguarding concerns**, including signs of abuse, neglect, self-neglect, exploitation or situations where an individual may be at risk of harm.
- **Follow safeguarding procedures** when concerns are identified.
- **Report safeguarding concerns promptly** through the appropriate channels and never assume someone else will do so.
- **Respect confidentiality**, sharing safeguarding information only with those who need to know.
- **Support a culture of care and accountability** where concerns can be raised without fear and the wellbeing of residents and customers is prioritised.

Expertise

We invest in our people, equipping them with the knowledge, skills, and expertise necessary to deliver a quality service every time.

Use of Company Resources

Why does this matter?

Sureserve's resources are provided to help us deliver safe, efficient and high-quality services. Misuse, theft, damage or waste of company resources increases costs, reduces productivity and can damage the trust placed in us by customers, shareholders and colleagues. We are all responsible for protecting and using company resources responsibly.



What does this mean for you?

You must:

- **Use company resources responsibly** and only for legitimate business purposes.
- **Protect company assets** from loss, theft, damage or unauthorised use.
- **Use technology appropriately** by complying with company policies relating to IT systems, devices, email and internet usage.
- **Prevent waste and misuse** by using materials, equipment, vehicles and resources efficiently.
- **Take care of customer assets** entrusted to you and use them only for their intended purpose.
- **Use working time effectively** by carrying out your duties professionally and avoiding activities that interfere with your responsibilities.
- **Report loss, damage or misuse** of company resources as soon as you become aware of it.

Data Protection, Privacy and Cyber Security

Why does this matter?

We are entrusted with personal, confidential and other sensitive information belonging to our employees, customers, residents, suppliers and business partners. Protecting this information is essential to maintaining trust, complying with legal obligations and safeguarding our business. A failure to protect information or systems can result in data breaches, financial loss, operational disruption and reputational damage.



What does this mean for you?

You must:

- **Handle information responsibly** by complying with applicable data protection laws, company policies and procedures.
- **Protect confidential information** and only access, use or share information where there is a legitimate business need and appropriate authorisation.
- **Keep information secure** by following company policy for storage, transmit and disposal.
- **Use systems and devices securely** by protecting passwords, using approved technology and following cyber security guidance.
- **Remain vigilant to cyber threats** including suspicious links, malware and other attempts.
- **Protect personal data**, ensuring it is collected, used, stored and shared lawfully and appropriately.
- **Seek guidance** when unsure about the handling of information, personal data or cyber security requirements.
- **Report data breaches and security incidents immediately** if information is lost, misused, disclosed incorrectly or compromised.

Media Relations and Public Communications

Why does this matter?

Our reputation depends on accurate, consistent and responsible communication. Information shared with the media, online or in public forums can quickly reach a wide audience and may affect our customers, employees, business partners and reputation. To ensure information is accurate and appropriate, only authorised individuals may speak on behalf of Sureserve.



What does this mean for you?

You must:

- **Refer media enquiries appropriately** by directing all requests from journalists, broadcasters or other media to the Marketing Team, senior management or other authorised spokesperson.
- **Only speak on behalf of Sureserve when authorised** to do so as part of your role.
- **Protect confidential information** and ensure sensitive business, customer, employee or supplier information is not disclosed without approval.
- **Use social media responsibly** and avoid content that could damage Sureserve's reputation or be perceived as representing the views of the company.
- **Ensure public statements are accurate** and consistent with company policies, values and publicly available information.
- **Seek guidance** when unsure whether information can be shared externally.
- **Report concerns promptly** if you become aware of unauthorised communications, incorrect public statements, misuse of social media, or disclosure of confidential information.

Social Media

Why does this matter?

Social media is an important way for people to communicate, share ideas and engage. However, information shared online can reach a wide audience and remain publicly available for a long time. We must use social media responsibly and ensure our online activity does not compromise confidential information, damage our reputation, or undermine trust.



What does this mean for you?

You must:

- **Use social media responsibly** and act in a way that is consistent with our values and standards of conduct, remember that when using social media at work or in your personal time you may be recognised as a Sureserve employee.
- **Respect others online** and never create, share or endorse content that is offensive, discriminatory, harassing or defamatory.
- **Distinguish personal views from company views** and never present personal opinions as those of Sureserve.
- **Only speak on behalf of Sureserve when authorised** to do so as part of your role.
- **Protect confidential information** and never share information about customers, residents, colleagues, suppliers or business activities without appropriate authority.
- **Use working time appropriately** and ensure social media use does not interfere with your responsibilities.
- **Report concerns promptly** if you become aware of inappropriate social media activity that could impact Sureserve, our people, customers or stakeholders.

Artificial Intelligence (AI)

Why does this matter?

Artificial Intelligence (AI) tools can improve productivity, efficiency and decision-making. However, they must be used responsibly to protect confidential information, maintain data security and ensure that business decisions are based on accurate and reliable information.



What does this mean for you?

You must:

- **Use only approved AI tools** and in accordance with company policies and guidance.
- **Use AI tools responsibly** and in accordance with company policies and approved systems.
- **Never enter personal, confidential or commercially sensitive information** into AI platforms.
- **Protect data privacy and security** and ensure information is handled appropriately.
- **Review and verify AI-generated content** before relying on it for business decisions, communications or work outputs.
- **Ensure appropriate human oversight** and never rely solely on AI when making decisions that could affect individuals, customers, colleagues or business outcomes.
- **Respect intellectual property, copyright and data privacy** requirements when creating, using or sharing AI-generated content.
- **Take accountability for your work** and never assume AI-generated information is accurate, complete or unbiased.
- **Seek guidance** if unsure about the appropriate use of AI tools or technologies in your role.

Integrity

We do the right thing. We believe in transparent communication, ensuring that our interactions are clear and open.

Bribery, Corruption, Gifts and Hospitality

Why does this matter?

We build our relationships with customers, suppliers, partners and communities on trust, integrity and transparency. Bribery, corruption and the inappropriate giving or receiving of gifts and hospitality can compromise decision-making, damage our reputation and expose both individuals and Sureserve to legal, financial and regulatory consequences.



What does this mean for you?

You must:

- **Never offer, give, request or accept bribes** or any other improper payment, benefit or advantage.
- **Never offer or accept anything** intended to influence a business decision or create a sense of obligation.
- **Never make improper payments** through third parties or allow others to act in a way that would breach our standards.
- **Understand and comply with the Gifts and Hospitality policy** maintaining correct approval and reporting for gifts, hospitality and business entertainment.
- **Maintain accurate records** of gifts, hospitality and related business expenses where required.
- **Report concerns promptly** if you suspect bribery, corruption or other unethical business practices.

Competition Laws

Why does this matter?

We compete fairly, ethically and in accordance with the law. Competition laws are designed to protect customers and ensure that organisations compete on merit, quality and value rather than through anti-competitive practices. Breaches of competition law can result in significant fines, criminal penalties, reputational damage and loss of customer trust.



What does this mean for you?

You must:

- **Compete fairly and independently** when making business decisions, setting prices, preparing bids or negotiating contracts.
- **Never agree with competitors to restrict competition** through price-fixing, market-sharing, bid-rigging or any other anti-competitive arrangement.
- **Never share commercially sensitive information with competitors**, including pricing, bidding strategies, customers, costs, market plans or other confidential business information.
- **Avoid inappropriate discussions with competitors** and leave any conversation or meeting that raises competition law concerns.
- **Take care when communicating business information** and ensure records, emails and other communications are professional, accurate and appropriate.
- **Seek guidance when unsure** and report any suspected anti-competitive behaviour promptly.

Conflicts of Interest

Why does this matter?

We are expected to make decisions objectively, fairly and in the best interests of Sureserve. Conflicts of interest arise when personal interests, relationships or outside activities influence, or appear to influence, our judgement. Even the perception of a conflict can damage trust and confidence in our decisions. Examples of conflicts of interest may include employing or supervising a family member, having a financial interest in a supplier or competitor, accepting personal benefits from a business partner, or undertaking external work that conflicts with your responsibilities at Sureserve.



What does this mean for you?

You must:

- **Avoid conflicts of interest** wherever possible and ensure personal interests do not influence your professional judgement.
- **Declare actual, potential or perceived conflicts** as soon as they arise and in accordance with company requirements.
- **Be transparent** about external interests including outside employment, directorships, investments or personal relationships that may create a conflict.
- **Avoid using your position for personal gain** or to benefit family, friends or other associates.
- **Seek approval** before engaging in activities that could create a conflict of interest.
- **Seek guidance and report concerns** if you are unsure whether a situation may create a conflict of interest or if you become aware of an actual, potential or perceived conflict.

Fraud and Financial Integrity

Why does this matter?

Fraud is any act of dishonesty or deception intended to obtain an unfair advantage, personal benefit or financial gain. This can include theft, false claims, misuse of company resources, falsifying records, fraudulent expenses or deliberately misleading information. Fraud damages trust, causes financial loss, harms our reputation and may result in criminal prosecution. We have zero tolerance for fraud in any form.



What does this mean for you?

You must:

- **Act honestly and with integrity** in all business activities and decisions.
- **Never engage in fraud, theft, deception or dishonest conduct** for personal or professional gain.
- **Maintain accurate records** by ensuring timesheets, expenses, invoices, certifications, financial information and other business records are complete, accurate and truthful.
- **Never create, alter, destroy or misrepresent records** in a way that conceals or inaccurately reflects events, transactions or performance.
- **Follow financial controls** and approval processes relevant to your role.
- **Protect company funds, assets and resources** from loss, misuse, theft or unauthorised use.
- **Remain vigilant to potential fraud** involving colleagues, customers, suppliers, subcontractors or other business partners.
- **Report suspected fraud immediately** if you become aware of or suspect any dishonest, fraudulent or unethical activity.

Sustainability

We work to be sustainable to the communities we serve and the planet we live on.

Environment

Why does this matter?

As a provider of compliance, energy and decarbonisation services, we have an important role to play in reducing environmental impact and supporting a more sustainable future. By using resources responsibly, reducing emissions and preventing pollution, we can contribute to protecting the environment for future generations while delivering long-term value for our customers and communities.



What does this mean for you?

You must:

- **Comply with environmental requirements** by following applicable laws and company policies.
- **Use resources responsibly**, reducing waste and using energy, water and materials efficiently.
- **Consider environmental impacts** in operational, business and purchasing decisions.
- **Prevent pollution and environmental harm** by handling materials, equipment and waste appropriately.
- **Support sustainability initiatives** that improve environmental performance and contribute to carbon reduction.
- **Challenge poor environmental practices** and take action where environmental risks are identified.
- **Report environmental incidents** or concerns promptly so corrective action can be taken.

Supporting Communities and Human Rights

Why does this matter?

We work in the communities we serve and recognise the positive impact our business can have on people's lives. We are committed to creating social value, supporting local communities, respecting human rights and preventing modern slavery, forced labour and exploitation. By acting responsibly and treating people fairly, we help build trust and contribute to stronger, more sustainable communities.



What does this mean for you?

You must:

- **Act responsibly in the communities we serve** and demonstrate our values in all interactions.
- **Represent Sureserve positively** when working in homes, neighbourhoods and communities.
- **Treat people fairly and with dignity** regardless of their background, role or circumstances.
- **Support social value activities** that create positive outcomes for residents and communities.
- **Respect human rights** and help create a working environment free from discrimination, abuse, exploitation and forced labour.
- **Remain alert to signs of modern slavery**, labour exploitation, coercion, human trafficking or other human rights concerns within our business and supply chain.
- **Raise concerns** regarding labour providers, subcontractors, suppliers or recruitment practices that appear unethical, exploitative or unlawful.
- **Work with ethical suppliers** and partners who share our commitment to responsible business.
- **Raise concerns immediately** if you become aware of, or suspect, any human rights violations, modern slavery or exploitative labour practices.



Sureserve Group Limited

Norfolk House
13 Southampton Place, London,
WC1A 2AJ