



Play Constructor

Compliance & Ethics Program

Aligned with common European construction-sector compliance expectations (EU/UK).

Version 1.0 | 2026-03-01

Website: www.playconstructor.com

Document Control

Document owner	Compliance Officer (or Managing Director until appointed)
Applies to	All employees, directors, temporary workers, interns, and contractors working for or on behalf of Play Constructor
Scope	All projects, offices, sites, and business activities
Effective date	2026-03-01
Review cycle	At least annually and after major legal/operational changes
Contact	compliance@playconstructor.com (recommended) / or via the reporting channels in Section 12

About this Program

This Compliance & Ethics Program sets out the minimum standards of conduct expected at Play Constructor. It is designed to support lawful, ethical, safe, and environmentally responsible delivery of construction services. It combines a Code of Conduct with practical compliance controls common in European construction companies, including anti-bribery, competition law, health and safety, environmental protection, modern slavery prevention, data protection, and reporting mechanisms.

Guiding Principles

- We comply with applicable laws and contract requirements in every country where we operate.
- We act with integrity: no bribery, no facilitation payments, no fraud, no unfair competition.
- We protect people: safety is a condition of employment and of doing business with us.
- We protect the environment and reduce our impacts wherever practicable.
- We respect human rights and do not tolerate forced labor, child labor, or discrimination.
- We speak up: concerns are raised early and investigated fairly, without retaliation.

1. Governance and Responsibilities

Clear accountability is essential for an effective compliance program.

1.1 Leadership commitment

The Board/Managing Director endorses this Program and ensures resources for implementation, including training, audits, and investigations.

1.2 Roles

Role	Key responsibilities	Typical evidence
Managing Director / Board	Tone from the top; approve policies; review serious incidents; ensure remediation.	Annual compliance statement; management reviews; KPI dashboards
Compliance Officer (or delegate)	Maintain policies; run training; manage reporting channels; coordinate investigations; monitor third-party risk.	Training logs; due diligence files; investigation reports
Project Directors / Site Managers	Implement site controls (H&S, permits, subcontractor oversight); stop unsafe or unethical work.	Site inductions; permits; toolbox talks; inspections
Employees and workers	Follow the Code; complete training; report concerns; cooperate with investigations.	Acknowledgement forms; training completion
Suppliers / subcontractors	Meet contractual compliance obligations; allow audits; cascade requirements to their teams.	Signed supplier code; audits; corrective action plans

1.3 Policy hierarchy

If local law is stricter than this Program, follow local law. If this Program is stricter than local law, follow this Program unless prohibited by law.

2. Code of Conduct

Our Code of Conduct applies to everyone working for or on behalf of Play Constructor.

2.1 Expected behaviors

- Act honestly and transparently in all business dealings.
- Avoid conflicts of interest or disclose them promptly (Section 6).
- Protect company assets, client property, and confidential information.
- Keep accurate records; never falsify timesheets, test results, certifications, or invoices.
- Treat colleagues and third parties with respect; no harassment or bullying.

2.2 Zero tolerance

We do not tolerate bribery, fraud, theft, violence, retaliation against reporters, or serious safety violations.

3. Anti-Bribery and Corruption

Play Constructor prohibits bribery in any form. This section reflects common EU/UK expectations (e.g., UK Bribery Act-style controls) and applies regardless of local customs.

3.1 Prohibited conduct

- Offering, promising, giving, requesting, or accepting anything of value to obtain an improper business advantage.
- Facilitation payments (small payments to speed up routine actions).
- Kickbacks, bid rigging, or undisclosed commissions.
- Using third parties (agents, consultants, subcontractors) to do anything we are prohibited from doing directly.

3.2 Gifts, hospitality, and expenses

Gifts and hospitality must be reasonable, infrequent, transparent, and never linked to a business decision.

Type	Allowed only if...	Approval threshold (recommended)
Low-value gifts (e.g., branded items)	Not cash; lawful; not during tender evaluation; recorded if required.	Line manager if > EUR 50
Meals/hospitality	Work-related; modest; with attendee list; recorded.	Project Director if > EUR 150 per person
Travel/accommodation for third parties	Generally prohibited. Exceptions only for legitimate site visits with written justification.	Managing Director + Compliance
Cash or cash-equivalents	Never.	N/A

3.3 Political and charitable contributions

Political contributions on behalf of the company are prohibited unless approved in writing by the Board and Compliance. Charitable donations must be vetted to prevent misuse as a disguised bribe.

3.4 Recordkeeping

All payments must be accurately recorded with sufficient detail. Off-book accounts are prohibited.

4. Competition and Fair Dealing

We compete fairly and comply with competition/antitrust laws. In construction, risks include bid coordination, market sharing, and price fixing.

4.1 Rules of conduct

- Do not discuss prices, margins, bid strategy, or sensitive commercial information with competitors.
- Do not agree with competitors to divide markets, clients, or territories.
- Do not exchange commercially sensitive information via trade associations or informal channels.

- If a competitor tries to discuss prohibited topics, stop the conversation and report it to Compliance.

5. Fraud Prevention and Financial Integrity

Construction projects are high-risk for fraud due to complex procurement and subcontracting. Controls must be in place.

5.1 Key controls

- Segregation of duties for purchasing, receipt, and payment approvals.
- Three-way match (purchase order, delivery/acceptance, invoice) where applicable.
- No payments to personal accounts; use verified bank details and change controls.
- Transparent tender evaluation and documentation retention.
- Audit rights and cooperation with client audits.

6. Conflicts of Interest

A conflict arises when personal interests could improperly influence business decisions.

6.1 Examples

- Hiring or supervising relatives without disclosure.
- Owning a financial interest in a supplier/subcontractor.
- Receiving personal benefits from a vendor (discounts, side jobs).
- Outside employment that interferes with duties or uses confidential information.

6.2 Disclosure

Conflicts must be disclosed promptly to the line manager and Compliance. A mitigation plan will be documented (e.g., recusal from decisions).

7. Health, Safety and Wellbeing

Safety is a core value and a contractual requirement. We aim for zero harm.

7.1 Minimum site standards

- Site induction for all personnel before work starts.
- Risk assessments and method statements (RAMS) for high-risk activities.
- Permit-to-work where required (hot work, confined spaces, lifting, excavations).
- Mandatory PPE as defined by site rules and task risk assessment.
- Stop Work Authority: anyone may stop work if unsafe conditions are observed.
- Incident reporting, investigation, and corrective actions.

7.2 Subcontractor safety management

Subcontractors must meet Play Constructor standards, participate in toolbox talks, and provide competent supervision. Repeated serious non-compliance may lead to removal from site.

8. Environmental Management

We prevent pollution and comply with permits, waste rules, and client environmental requirements.

8.1 Controls

- Spill prevention (secondary containment, drip trays) and immediate reporting of releases.
- Waste segregation and lawful disposal with traceability.
- Dust/noise/vibration controls and monitoring where required.
- Responsible materials handling (SDS availability; safe storage).
- Protection of waterways, drainage systems, and sensitive habitats.

9. Human Rights, Labor Standards and Modern Slavery

Play Constructor supports internationally recognized human rights and aligns with common European expectations on labor standards and supply-chain due diligence.

9.1 Commitments

- No forced labor, bonded labor, or human trafficking.
- No child labor; comply with minimum age laws and safe youth work rules.
- Freedom of association and collective bargaining respected where lawful.
- Equal opportunity; no discrimination or harassment.
- Fair wages and working hours compliant with law and contracts.

9.2 Worker welfare on sites

We require suitable welfare facilities (sanitary, potable water, rest areas) and respect for worker dignity.

10. Data Protection and Confidentiality

We protect personal data and confidential information. Where EU personal data is processed, GDPR principles apply (lawfulness, fairness, transparency, minimization, security).

10.1 Practical rules

- Collect only the personal data needed for a legitimate purpose.
- Store data securely and limit access to those who need it.
- Use approved systems; avoid sharing sensitive data via unsecured channels.
- Report suspected data breaches immediately to Compliance/IT.
- Respect client confidentiality and NDA obligations.

11. Third-Party Management (Suppliers, Subcontractors, Agents)

We are accountable for the actions of third parties working for us.

11.1 Due diligence (risk-based)

- Screening for sanctions, adverse media, and integrity risks.
- Verification of legal registration, beneficial ownership (where possible), and competence.
- Confirmation of H&S capability and insurance.
- Written contract clauses: anti-bribery, audit rights, modern slavery, data protection, and termination for breach.

11.2 Onboarding checklist (recommended)

- Supplier Code of Conduct signed
- Bank details verified using independent source
- Insurance certificates valid
- H&S plan/RAMS reviewed (for site work)
- Training/induction completed

12. Speaking Up (Whistleblowing) and Non-Retaliation

We encourage early reporting of concerns. Retaliation against anyone who raises a concern in good faith is prohibited.

12.1 Reporting channels

- Line manager or Project Manager
- Compliance Officer (email/phone)
- Confidential reporting mailbox (recommended)
- Anonymous channel (recommended where legally permitted)

12.2 What to report

- Bribery, corruption, fraud, theft
- Bid manipulation or unfair competition
- Serious safety hazards or incidents
- Environmental spills or unlawful disposal
- Harassment, discrimination, or violence
- Human rights or labor abuses in our projects or supply chain
- Data breaches or misuse of personal data

12.3 Handling reports

Reports are assessed promptly, investigated proportionately, and documented. Confidentiality is protected to the extent possible. Where required, matters may be escalated to clients or authorities.

13. Investigations and Disciplinary Measures

Breaches may result in disciplinary action up to and including termination, contract cancellation, and reporting to authorities.

13.1 Principles

- Fair process and respect for privacy
- Preservation of evidence and secure recordkeeping
- No retaliation
- Corrective and preventive actions tracked to closure

14. Training, Communication and Continuous Improvement

Training is mandatory and refreshed periodically, especially for high-risk roles (procurement, bidding, site leadership).

14.1 Minimum training (recommended)

- Code of Conduct (all personnel)
- Anti-bribery and gifts/hospitality (all commercial roles)

- Competition law (estimators, bid teams, managers)
- Health & Safety induction and task-specific training (site personnel)
- Environmental awareness and spill response (site personnel)
- Data protection basics (all personnel)

15. Appendix A - Quick Reference: Red Flags

Stop and seek guidance if you see any of the following:

- Requests for cash, urgency payments, or payments to third-country accounts.
- Unusual commissions, success fees, or vague 'consulting' services.
- Supplier refuses to provide ownership details or compliance commitments.
- Requests to backdate documents or alter test/inspection results.
- Competitor contacts suggesting bid coordination or 'taking turns'.
- Unsafe work practices or repeated near misses ignored by supervision.
- Workers showing signs of coercion, withheld IDs, or unpaid wages.

Appendix B - Acknowledgement Form

I acknowledge that I have read, understood, and will comply with the Play Constructor Compliance & Ethics Program.

Name	
Role / Company (if contractor)	
Signature	
Date	

