



**Company Policy  
For  
Ethical**

Company Policy

Issue Date

Review Date

Page 1 of 7

**Our Vision and Values ‘**

Our Business Principles govern the manner in which we at The organisation conduct ourselves. They have been set by the Group and are a requirement placed upon each individual operating division. We apply these principles across the Group, they are subject to annual review and staff comment upon them is encouraged.’

The organisation vision and values are integral to the way we do business and our culture reflects this.

Our values:

- Trust,
- Sharing and supporting,
- Pride and passion,
- Sustainability,
- Innovation.

Our values help to define our culture, motivating our staff to give their best and instilling in our clients confidence that we will deliver solutions of the highest quality. Meeting our stakeholders' expectations is of great importance and we will continue to review and improve the way our business operates and delivers its services.

One of our core values at The organisation is Trust; we insist that this is prevalent in all of our business activities. Integral to trust is the need to act with honesty and integrity in all aspects of our operations and we expect the same from our clients and business partners.

These principles are incorporated into all of our projects, working environment, supply chain management and in the procurement of resources.

Our principles are aligned with best practice in corporate responsibility using the Global Reporting Initiative as the framework for our aims.

**Economic**

We recognise the importance of delivering long-term, sustainable value. We need a strong financial base to fulfil our social and environmental responsibilities and the sustainability and continuity of our business.

**Business Integrity**

Our commitment to business integrity is clear and unequivocal, dishonest practices distort markets and waste resources. We condemn corrupt and fraudulent practices and require transparency, integrity and honesty in all aspects of our business.

The organisation and our employees and agents are prohibited from, directly or indirectly, offering or authorising payments, gifts or inducements to any person for the purposes of securing any improper business or other advantage.



**Company Policy  
For  
Ethical**

Company Policy

Issue Date

Review Date

Page 2 of 7

We do not, directly or indirectly, solicit, accept or receive any gift, payment or other advantage from any person or organisation in return for providing any improper business or other advantage. The organisation recognises that facilitation payments are prohibited under the anti-bribery laws of most countries and complies with all relevant law. In countries where such payments are not prohibited by law and form part of the business culture they remain unacceptable to The organisation and our staff are instructed not to participate in them but to report any such event to their line manager for further action.

Our staff are permitted to offer and accept entertainment and hospitality in the course of business provided that it is modest, does not exceed reasonable local business practice and is permissible under all applicable laws. Such acceptance is not permitted where it may be perceived as having a material impact on any business transaction, could break any applicable law or where it may not comply with our other business integrity principles.

No undisclosed or unrecorded account, fund or asset shall be established or maintained by any person or organisation. Full and proper records shall be kept of all transactions involving the company. Supporting documents shall be readily available, genuine and shall accurately describe the nature of any transactions undertaken. We have a set of business integrity guidelines and training for all staff. We have also developed a programme of internal and third party audits, the findings of which are reported at Board level.

#### **Open Reporting**

We expect all our staff, sub contractors; sub consultants; business partners and agents who suspect wrongdoing at work or breaches of these principles to raise any concerns they may have through our secure and confidential noncompliance reporting facility. The Group Accountant acts as an internal Ombudsman to facilitate investigation, report to the Board, and maintain the confidentiality of the individual who raised the concern. All staff and managers are expected to fully co-operate with any resulting investigation or enquiry.

A party raising a concern will not be subjected to penalty or reprimand. Any form of reprisal against the individual who has raised an issue in good faith will be a disciplinary offence.

#### **Business Partner**

We seek mutually beneficial relationships with our business partners and clients. The ability to comply with these business principles effectively will be the dominant factor in determining whether we can enter into, or remain within, such relationships.

We require that all of our business partners accept and abide by our business principles as detailed herein. To formalise this requirement our standard terms and conditions of engagement always include the Business Principles contained within this document.

#### **Employee**

Our business is based upon the skills and knowledge of our people. We devote significant resource and investment to the recruitment and retention of staff. Our aim is simple, to be the preferred employer in all areas within which we operate. Recruitment of high calibre staff is crucial to our continued success.

We are an equal opportunities employer, recognising that future success in a highly competitive marketplace depends on our employees and their development. We aim to ensure that all staff have the opportunity to achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria.



**Company Policy  
For  
Ethical**

Company Policy

Issue Date

Review Date

Page 3 of 7

We are committed to providing a good work life balance for our staff and have implemented a number of initiatives including job swap, job sharing, flexible hours and supporting voluntary work to achieve this aim.

**Service**

We take a responsible approach to the way we deliver our professional services. We are open and honest in all our communications both internally and externally. We have staff across our business that has responsibility for our compliance with all relevant local laws and regulations. The organisation employees represent the company to our clients and the general public and we expect that their behaviour, appearance and work performance reflects at all times the highest professional standards.

**Health and Safety**

We recognise the importance of building a healthy and safe working culture for our employees from the start of their employment. Our policies and procedures are set out and communicated to staff when they join. The promotion of employee's health and safety at work is an essential part of management duties and every employee's responsibility.

We are committed to maintaining and improving the safety of those who work for and on behalf of The organisation . Some of our staff work in countries where security, safety and health risks exist. To minimise risk and improve employee welfare, we undertake a range of measures including risk assessments, specialist information and training for staff operating overseas.

We deliver projects worldwide within differing legislative regimes that govern health, safety and welfare. In each country we are committed to adopting and implementing the The organisation Group Health and Safety system which is in line with global best practice. Safety considerations in design are of paramount importance to The organisation and we endeavour to work with our clients to address safety on projects where appropriate.

Please refer to the safety policy for further initiatives

**Environmental**

The Company provides solutions and applies skills and knowledge to improve the environment globally. We work closely with industry bodies, clients and relevant government agencies to influence the sustainability agenda. We are committed to reducing the environmental impact associated with our operations through our delivery of services.

We are developing and implementing initiatives across our business to make key performance improvements. The operations of our clients can have a direct impact upon the environment, particularly those clients operating in the construction sector. We give our clients the appropriate environmental information to make informed project decisions and apply the best available environmental technologies where appropriate.

Please refer to the environmental policy for further initiatives

**Human Rights**

Our workplaces are free from unlawful discrimination on the grounds of sex, race, nationality, ethnic or national origin, gender (including gender reassignment), sexual orientation, age, marital status, religious belief or disability. We do not treat staff less favourably simply because of the contract they are employed under. We recognise the Universal Declaration of Human Rights and are committed to the principles of the



**Company Policy  
For  
Ethical**

Company Policy

Issue Date

Review Date

Page 4 of 7

UN Global Compact. We endorse the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and are committed to these following principles to ensure those human rights issues do not adversely impact on our business and the communities in which our employees work.

The organisation will abide by the intentions of the Ethical Trading Initiative Base Code, and extend this where appropriate through our supply chain.

We ensure child labour is prevented through our supply chain by vetting our suppliers and contractors on a regular basis and monitoring their performance and procedures.

### **Community**

The Company contributes to the economic, social and sustainable development of the host countries and communities in which we operate through providing local employment and facilities. We act in a socially responsible manner when delivering projects on behalf of our clients.

Some of our initiatives include:

- Employ local people and utilize local subcontractors and suppliers.
- Become involved with local business and professional forums.
- Support local charities and events.
- Build relationships with local schools and education establishments.
- Offer training and apprenticeship opportunities
- Carry out charity work
- Organise and attend residents meeting

Please refer to the corporate social policy responsibility for further initiatives

### **Our Business Principles**

Decisions regarding charitable donations including sponsorship, charity collections and matched giving are made by the directors of the organisation. However, we do not make political contributions or allow our clients to direct our charitable donations.

### **Personal Conduct**

We expect and require honesty, openness and courtesy from all our staff and the staff of our business partners and supply chain. This means that all shall act in an ethical and professional fashion, respecting the dignity and human rights of all the persons we encounter.

We require all staff to report promptly to their line or project manager any violations of law or our stated principles or our company policies. Where subsequent actions do not alleviate the original concern staff are required to report the matter to the relevant Director for further investigation and action. All staff are required to cooperate fully with any subsequent audit, enquiry or investigation by the company.

### **Moving Forward**

We are judged by what we do, not by the words within documents such as these. It is therefore essential that these 'Business Principles' form our code of normal behaviour. Senior Managers are expected to be ethical role models and demonstrate visible support for these Business Principles by regularly encouraging compliance by all staff under their managerial control.

It is every Manager's responsibility to ensure that their staff receive full guidance, support and training on acceptable, ethical behaviour and legal compliance as relevant to their job. All staff who fail to comply with



**Company Policy  
For  
Ethical**

Company Policy

Issue Date

Review Date

Page 5 of 7

these Business Principles shall be subject to formal disciplinary action in accordance with the Company's formal disciplinary procedures, including dismissal.

#### Dealings with suppliers of goods and services

We are committed to developing relationships with suppliers of goods and services based on mutual trust and shared values. Therefore we will:

- Maintain high standards of integrity in business relationships with suppliers
- Ensure that all employees will conduct business with suppliers of goods and services in a professional manner
- Encourage suppliers to operate with values and principles equivalent to ours

#### Dealings with competitors

We are committed to competing vigorously and in a lawful manner. In doing so, we will:

- Avoid disclosing proprietary or confidential information in any contact with competitors
- Not attempting to acquire information regarding a competitors' business by unlawful means, including industrial espionage, hiring competitors' employees to gain confidential information, urging competitors' employees to disclose confidential information, or any other approach that is not above board

#### Dealings with Government, Legislators and Regulators

We aim to have constructive and open relationships with Government and regulators to foster mutual trust, respect and understanding. Therefore we will:

- Not knowingly evading tax obligations
- As a publicly quoted UK company seek to comply with recognised good corporate governance standards

#### Gifts and Hospitality Policy

The Company acknowledges the fact, and general principle, that gifts and hospitality given or received by employees, suppliers and business partners are part of normal business activity. The policy and guidelines which are set out below are intended to form the framework which shall govern the Group's activities in all of the territories within which it operates.

The Group also recognises that Directors and Senior Managers of its operating companies and divisions have previously demonstrated sound judgement in these matters and are fully aware of the issues involved. In consequence the guidelines contained herein are not intended to bind the Directors and Senior Managers but to offer guidance where they are required to advise staff for whom they are responsible.

The organisation staff are prohibited from offering, soliciting, or accepting any gift/hospitality which could reasonably be deemed likely to influence any future business decision. The organisation recognises and accepts that the occasional offer/acceptance of a modest gift/hospitality can make a valuable contribution to the development and maintenance of good business relationships.

The Company acknowledges that what constitutes an acceptable modest gift/hospitality in one business culture or geographic location may be inappropriate in another. Accordingly, the definition of what would constitute a modest gift/hospitality in a particular region is delegated to the Managing Director

As general guidance the newspaper headline test should be adopted whereby a hypothetical question is posed by the person offering or recipient of a gift/hospitality asking "would I be comfortable if the facts of this gift or

	<b>Company Policy For Ethical</b>	Company Policy
		Issue Date
		Review Date
		Page 6 of 7

hospitality were made public in a trade magazine or local newspaper?” If the response is anything other than “perfectly comfortable” then the activity should cease.

In order to set a guidance framework for the less senior staff within the operating companies and divisions of the Group the following matters and provisions shall be met by every operating division, company or business:

- No member of The organisation staff shall offer or accept gifts/hospitality in isolation or in secret from relevant colleagues and/or their immediate manager.
- The monetary value of an acceptable modest gift shall be identified and made known to relevant staff by the local Board or Senior Management group. It shall not generally exceed 0.25% of the national average wage paid within the relevant region or country.
- The monetary value and frequency of an acceptable offer or receipt of hospitality shall be identified and made known to staff by the Senior Management group.
- The monetary value shall not generally exceed 1% of the national average annual wage paid within the relevant region or country. Additionally it shall not exceed the maximum frequency of occurrence as set by the local Board or Senior Management group.
- Each office or business shall maintain an auditable gift/hospitality register, which a designated Senior Manager shall be advised of and record all offers and acceptances of gifts and hospitality to or from The organisation staff who are not Directors or Senior Managers and which breach the monetary value and/or frequency guideline limits detailed above.
- All The organisation staff shall take full account of the other parties’ company policy when offering or responding to offers of gifts and hospitality.
- Cash or vouchers shall never be offered or accepted as a gift.
- The organisation staff shall always comply with all applicable local laws.
- All activities associated with offering or receiving of gifts/hospitality shall be open, transparent and fully identifiable by an independent third party.

Signed

..... Date:.....



**Company Policy  
For  
Ethical**

Company Policy

Issue Date

Review Date

Page 7 of 7