

# CODE OF ETHICS

V.4 2020



## **Introduction**

The morality of our Company is underpinned by Company Values of which Integrity and Respect are at the forefront. The requirement to our stakeholders, whether employees or clients, is to maintain a high and unwavering level of integrity and respect throughout all our business activities and our employees are measured against these.

Our Code of Ethics summarises our stance in relation to some key ethical subjects.

## **Modern Slavery**

This statement sets out our stance to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and supply chains.

As part of the construction sector, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

The Company is committed to the principle of equal opportunities for all employees and workers, regardless of sex, race, religion or belief, age, marriage and civil partnership, pregnancy and maternity, sexual orientation, gender reassignment, or disability. As outlined within our Equal Opportunities, Diversity and Non-Discrimination Policy.

## **Equal pay**

This statement is intended to set out how the Company will demonstrate its commitment to equal pay. As part of our commitment to equal opportunities, the Company believes that its male and female workers should receive equal pay for:

- the same or similar work;
- work rated as equivalent under a job evaluation study; or
- work of equal value.

Equal pay means all forms of contractual remuneration (including contractual bonus payments, overtime rates, pension benefits and holiday pay) and non-cash contractual benefits such as a company car/company mobile phone etc.

The Company aims to ensure that it operates a fair and transparent pay system based on objective criteria and free from gender bias.

## **Anti-Bribery and Corruption**

The Company is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This statement outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. The Company will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Our Anti-Bribery and Corruption policy applies to all employees and officers of the Company, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the Company ("associated persons") within the UK and overseas. Every employee and associated person acting for, or on behalf of, the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

The Company may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by the Company. The Bribery Act 2010 is in force from 1 July 2011. Our Anti Bribery & Corruption policy covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, the Company; and
- the consequences of any breaches of this policy.

### **Equal Opportunities, Diversity & Non-discrimination**

The Company has a policy of equal and fair treatment and we are fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the Company.

We are committed to achieving the fullest utilisation of resources and expects employees to contribute to the well-being of the Company to the best of their ability. Consistent with this, the Company has an established policy of equal opportunities regardless of sex, race, colour, nationality, ethnic origin, religion/belief, age, disability, marital status, part-time or fixed-term status, parental or carer responsibilities or sexual orientation. This policy has been established to ensure the Company is working to achieve a situation where no employee, employment candidate, client or contractor unjustifiably receives less favourable treatment, discrimination, harassment or victimisation on any of the aforementioned grounds. Recruitment, learning and development opportunities and other employment decisions will be made on the basis of fair and objective criteria.

The Company will not discriminate because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (which includes colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. It will not discriminate because of any other irrelevant factor and will build a culture that values meritocracy, openness, fairness and transparency.

### **Corporate social responsibility**

The Company is committed to integrating environmental best practice into all its business activities. The Company accepts its environmental responsibilities and recognises its obligation to reduce the impact of business activities on the environment. The Company will achieve this through a policy of continual improvement in environmental performance.

Signed:



Angeline Barnes Chartered FCIPD (Head of HR)