

1MCo3 Main Works – Contract Lot S1

Ethical Business Conduct Policy

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Revision	Author	Checked by	Approved by	Date approved	Reason for revision
Co1	Theeba Ragunathan	James Billingham	Isabel Coman	30/05/2018	internal
Co2	Peter Jones	Elizabeth Tarr - Costain	Board Members as per main body of the policy	As per main body of the policy	Annual review

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Ethical Business Conduct Policy

Skanska Costain STRABAG Joint Venture (SCS JV) recognises the importance of adhering to the principles of ethical business conduct in the successful delivery of its activities and is committed to operating its business, both sustainably and responsibly.

The policy applies to SCS JV, their officers, directors and employees whether permanent or temporary. It also applies to all SCS JV supply chain partners, including agents, consultants, joint venture partners and subcontractors ("Associated Persons").

This policy is a declaration of SCS JV's intent of ensuring that all SCS JV staff and Associated Persons act and are seen to act with uncompromising honesty and integrity in everything they do, as stipulated in the SCS Code of Conduct. It is based on the following core values that underpin the way we act at work:

- Creating a safe working environment free from harm;
- Providing a healthy working environment for all our people;
- Demonstrating uncompromising honesty and integrity in everything we do;
- Encouraging open, honest and respectful communications;
- Providing innovation in the workplace in order to deliver efficient, innovating and sustainable solutions to our customers;
- Valuing an inclusive, diverse and talented workforce;
- Work with suppliers and subcontractor who have a 'like-minded' ethical business.

This policy sets out the corporate standards for upholding ethical business practices and demonstrates our commitment to acting honestly and in a professional and ethical manner. The giving, receiving, or offering of bribes is contrary to the Bribery Act of 2010 and plays no part in how we conduct business. SCS JV also has a zero tolerance to fraud and other criminal offences carried out by individuals working for or associate with SCS JV.

SCS JV encourages all SCS JV staff and Associated Persons to raise their concerns about any malpractice at the earliest possible stage commonly known as 'whistleblowing', in accordance with the SCS JV 'Whistleblowing' policy 1MCo3-SCJ-HS-POL-S001-000007). The SCS Ethics Committee will ensure that the concern is handled in accordance with the appropriate SCS JV policy as listed below, which comply with the HS2 Works Information, and in any case will be handled with the highest degree of confidentiality and sensitivity. SCS JV staff and Associated Persons should note that the SCS JV Ethics Committee, managed by the SCS Ethics Officer, is there to ensure adherence to the principles set out within this (and other) policies.

Bribery, Fraud and Corruption: We must not engage in any fraudulent or corrupt business practice (see the Anti-Bribery Policy 1MCo3-SCJ-LE-POL-S000-000001 and the Fraud Prevention Policy 1MCo3-SCJ-LE-POL-S001-000003).

Conflicts of Interest: We must avoid situations where personal interests or outside activities could be in potential conflict with those of SCS JV.

Competition: We must not act anti-competitively and must adhere to fair and open competition in our procurement processes.

Community Support and Fundraising Activities: We must support the local communities in which we operate.

Gifts and Hospitality: We must comply with the policy on being offered, giving or receiving hospitality and gifts and their recording (see the Anti-Bribery Policy 1MCo3-SCJ-LE-POL-S000-000001).

Political Contributions: We must not use SCS JV funds and resources to contribute to any political campaign, political party, political candidate or any of their affiliated organisations.

Whistle Blowing: If you have a concern about the conduct of any employee or anyone representing SCS JV, we want to know about it (see the Whistle Blowing Policy 1MCo3-SCJ-HS-POL-S001-000007).

Bullying, Racism and Sexism: We must recognise the benefit of having a diverse and inclusive workforce and ensure that we create an environment that is sustainable and beneficial for all persons and associates. We will not tolerate any bullying, racism or sexism.

The Policy will be reviewed annually to ensure the management system is suitable, effective, consistently implemented and continually improved to meet the SCS JV and HS2 requirements.

Compliance with this policy is mandatory. Any SCS JV staff breaching the same will be referred to their relevant Employer parent company who will deal with the staff member in accordance with the SCS JV staff member's personal contract of employment. (Note, SCS JV is not an Employer of any of SCS JV staff).

Approved by the SCS Joint Venture Board

Signed: _____ Signed: _____ Signed: _____
Skanska Costain STRABAG

Agreed to be implemented by the SCS Joint Venture Project Management Team

Signed: _____

James Richardson SCS JV Managing Director