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# Ethics in the workplace policy

## Revision schedule

Revision no.	Date	Details of change
Rev 1	June 2020	First Issue for new Infrastructure management system platform
Rev 2	June 2021	Minor changes to update business terminology following annual policy review
Rev 3	June 2022	Minor changes to enhance wording in 'confidentiality' section
Rev 4	June 2023	Annual policy review – minor administrative changes

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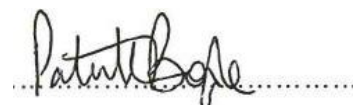
Morgan Sindall Construction is committed to high ethical and moral standards and expects all employees (as well as other stakeholders, within their own policies) to share this commitment.

We depend on mutual trust and goodwill for our business to flourish; if a business is not open and honest in all its dealings, if trust erodes or is absent, a business will fail. We have all witnessed lack of trust, dishonesty and greed bringing down companies from large national corporations to small family enterprises.

We aim to build trust with all our stakeholders, and we believe there is a fundamental requirement to operate with trust and integrity in all our day-to-day behaviours. None of us must feel under pressure to indulge in unethical behaviour in order to meet business requirements, whatever they are.

Accordingly, it is Morgan Sindall Construction policy to encourage a supportive culture where, with mutual support from our stakeholders, our teams, our managers and colleagues, difficult issues can be resolved if discussed openly and honestly. Acting with honesty and integrity is critical to our business and we urge all employees to do so and to raise issues if concerns arise relating to a failure to act in accordance with this Ethics in the Workplace Policy and the various Governance, Policies and Guidance which underpins it, as detailed below.

Signed



Pat Boyle  
**Managing Director – Construction**

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Our ethical behaviour in Morgan Sindall Construction will be displayed to our stakeholders in the following ways:

**Safety, Health, Wellbeing and the Environment** - fundamental to all our operations and impacting on all our stakeholders, we have comprehensive safety, health, wellbeing and environment policies and report regularly on performance.

**Investors** - a commitment to good corporate governance, transparency and fair dealing, ensuring full compliance with relevant laws and rules.

**Employees** - to attract and retain the services of individuals who are properly and appropriately skilled. We are committed to treating all employees with respect and consideration. We will invest in their development and seek to maintain regular two-way communication to ensure they feel part of our business and are enabled to make a full contribution to our future.

**Communities** - we will develop strong relationships within the communities where we work promoting community projects both internally and externally. The projects will reflect the priorities of these communities and delivering social value.

**Customers, Business Partners and Supply Chain** - based on fair, sound ethical practice, our relationships with our customers, suppliers, subcontractors and business partners will enable long-term relationships which are mutually beneficial.

**Non-Government Organisations (NGO)** - constructive relationships will be built and we understand that their input may lead to better business practices.

#### Supporting policies, procedures and monitoring

To guide and support our code of ethics and behaviours, the following important company policies, procedures and processes for monitoring are in place:

**Safety, Health, Wellbeing and the Environment** - fundamental to all our operations and impacting on all our stakeholders, we have a comprehensive safety, health, wellbeing and environment policy and report regularly on performance.

**Public interest disclosure** - otherwise known as '*whistle blowing*' or '*speaking out*'. This policy provides a confidential and secure means to enable our employees, suppliers, business partners and other stakeholders to raise concerns about conduct which is contrary to our values. We are committed to protecting any employee who reports a breach or suspected breach of the Code of Ethics.

**Competition Law Compliance** - Morgan Sindall Construction is entirely supportive of open and fair competition and is committed to adhering strictly to all competition laws in this regard, as well as procurers' published terms of engagement and enquiries. We do not condone any activity which might in any way unfairly restrict the level of competition expected by our customers and procuring authorities.

**Gifts and Hospitality** – this policy fits closely with the Bribery Prevention Policy. Those gifts and hospitality offered to and by Morgan Sindall Construction employees may be permissible if they are not excessive and are declared in accordance with the policy. Gifts and hospitality must not be solicited under any circumstances.

**Confidentiality** - we respect the need to keep certain information confidential to the company and identify information which may not be disclosed, communicated or used upon leaving the company. Retention of confidential information includes customer, prospective customer and in-company information. A clause is included in the contract of employment. We also respect the need to keep employees' previous company information confidential. All personal information will be treated in accordance with Data Protection and GDPR legislation.

**Conflicts of interest** - we require our employees to perform their duties honestly and to avoid conflict between any personal financial or commercial interests and their responsibilities to Morgan Sindall Construction. Any actual, potential or perceived conflicts of interest must be discussed with line management and a conflict of

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interest declaration completed.

**Equal Opportunities** - we promote equality in the workplace, as stated in this policy and we are keen to eliminate all forms of unfair discrimination.

**Dignity at Work** - we respect human dignity and the rights of individuals. Our policy articulates how we should behave towards each other and how not to.

**Disciplinary and Grievance** - statements and processes are in place regarding disciplinary action together with guidance on how grievances should be managed.

**Alcohol, Drugs and Substance Misuse Policy** - defines the company's stance on zero tolerance of substance abuse explains testing routes and those steps which those who may be dependent can take.

**Email and internet** - the care which should be taken when working in this medium, the inherent dangers and unacceptable activity are explained in these separate policies.

**Bribery Prevention** - we require our employees to perform their duties honestly, with integrity and to ensure that no act of bribery takes place by any person either employed by or acting as an agent of Morgan Sindall Construction, and that any bribe or offer of bribe is reported.

#### A behaviour challenge:

At Morgan Sindall Construction we believe that honesty is the best policy. It is an individual's choice - whether to steal, whether to lie, whether to deceive, but the decision affects the company as a whole. Small indiscretions add up, holes begin to appear, and this can quickly affect the well-being of a healthy company.

Challenge yourself with the following questions if you are in any doubt about the action you need to take. Challenge others also if, in your view, they may be likely to, or are, behaving unethically.

- Does it feel right?
- Does it look too good to be true? If so, it probably is. Sound it out with a colleague, manager, director, another department. Test it!
- Does the decision I have taken look and feel ethical? Could it be perceived or misconstrued as dishonest or inappropriate?
- Have I all the information I need to make this decision? If not, you may be misinterpreting the situation
- How would others - the company, senior management, supplier or customer feel if they became aware of my actions?
- Would I want to read about it in the newspaper or hear about it on the local television news?
- What would my family, parents, partner, children think about it?
- Does it, or might it, hurt anyone – physically, emotionally or by reputation?
- Finally, am I complying with the company's policies, procedures, standards and guidance?

#### Raising Concerns

Anyone who has a genuine concern about wrongdoing at work should feel confident that their concerns will be fully investigated and their confidentiality maintained. You can report your concerns in the first instance to your line manager, Head of Internal Audit, Director of Legal Services or Morgan Sindall Group General Counsel. If employees continue to have concerns and / or feel that they are unable to raise an issue in this way they should raise the matter using the Group's Raising Concerns helpline.

The helpline is available 24 hours a day, 7 days a week. The freephone number is 0800 915 1571 and all calls are taken by Safecall, an independent organisation with impartial staff trained to handle these types of calls. Alternatively submit a report online at [www.safecall.co.uk/report](http://www.safecall.co.uk/report).