

MABEY GROUP

ETHICS AND CONDUCT POLICY STATEMENT

Our Policy

We are committed to acting professionally and ethically in all our business dealings and relationships wherever we operate.

This is more than just following rules. As well as complying with all laws and regulations we must apply our principles and values. We must all ask ourselves, “Is this the right thing to do? Is this what the Mabey Group stands for?”

We will support all our personnel in doing what is right. No-one will be penalised for making the ethically correct decision.

This policy has been endorsed by the Mabey Holdings Board and the Mabey Group Executive.

Who this policy statement applies to

The Mabey Group Ethics and Conduct Policy Statement applies to all our personnel, to our representatives, distributors, and consultants, and to anyone acting on our behalf, in all our business locations and projects worldwide.

Commitments

The following commitments form the basis of our Group Ethics and Conduct Policies:

Health and safety

We will take all appropriate steps to ensure the health and safety of everyone who works for or with us.

Quality

We will supply products and services that meet the customer’s requirements.

Protecting the environment

We will take all appropriate steps to undertake our business in an environmentally responsible manner.

Laws

We will comply with all laws in all jurisdictions in which we operate.

Criminal activity: We prohibit all forms of criminal activity:

- We will not offer, give or receive bribes or improper payments, either directly or through any third party.
- We will not defraud or deceive anyone or act dishonestly.
- We will not make facilitation payments.
- We will not offer or accept any gifts, hospitality, donations or benefits that may improperly influence a business decision or impair independence or judgement.

- We will not participate in any other criminal activity, such as extortion, collusion, cartels, breach of trust, abuse of power, embezzlement, trading in influence or money laundering, or any similar or equivalent improper act or practice.

Conflicts of interest

We will avoid situations in which our personal interests or actions could conflict with the Mabey Group's best interests.

Human rights

We will respect and protect human rights.

Equal opportunity and diversity

We will treat everyone equally and encourage diversity. We employ and promote solely on merit.

Harassment, bullying or discrimination

We will not tolerate any kind of harassment, bullying or discrimination against anyone who works for us or with us.

Developing our personnel

We will help our personnel develop and achieve their potential.

Subsidiaries and affiliates

We will ensure that all of the Mabey Group's subsidiary companies and affiliates comply with this policy.

Relationships with third parties

We only work with organisations that conform to standards consistent with our own.

Procedures

We will implement appropriate management procedures to help prevent any breach of this Ethics and Conduct Policy, and to detect, report and deal with any breach which may occur.

Reporting

If you believe that there has been any breach of this Ethics and Conduct Policy Statement, please report immediately to your appropriate manager, or to Mabey Group Chief Legal Officer, Kate Beauchamp (k.beauchamp@mabey.co.uk).

Alternatively you can report to our independent reporting line **0800 374199 (UK)** or **+44 1249 661808 (Overseas)**. You may if you wish report confidentially or anonymously. We will always follow up a report and take appropriate action.

This Policy Statement has been authorised by the Mabey Holdings Limited Board

Ends