







1MCo₃ Main Works – Contract Lot S₁

Supplier Code of Conduct

MDL Code:

Document no.: 1MCo₃-SCJ-PR-POL-Soo₁-ooooo₁

Revision	Author	Checked by	Approved by	Date approved	Reason for revision
C01	Gareth Evans	-	Board Members as per main body of the policy	As per main body of the policy	Previously this document was only a text on the Procurement Plan

SECURITY CLASSIFICATION: Official

Handling instructions: Uncontrolled when printed

SCS Code of Conduct

General Principles

The key responsibility of SCS is to deliver economically sound projects in collaboration with our client, supply chain and community. SCS assumes its responsibilities where we have effective control. These include our responsibilities toward the communities and environments in which we operate, toward our employees, business partners and society in general. Therefore we have defined some key foundations for our performance:

- We are committed to doing business with a high degree of integrity and ethics.
- We comply with legal requirements that apply in the countries where we do business.
- We respect the United nations Universal Declaration of Human Rights and recognise our responsibility to observe those rights that apply to our performance towards our employees and the communities in which we operate. This commitment includes activities that relate to the rights and entitlement of Indigenous People.
- We are open-minded in dialogue with those who are affected by our operations. We respond to inquiries from external parties and communicate with affected parties in a timely and effective manner.

Within our sphere of influence we endeavour to ensure that in our projects, our suppliers, subcontractors, agents, joint ventures and other partners abide by the principles set out in our Code of Conduct.

Employee relations

A strong and consistent relationship with all employees built on mutual respect and dignity, is of vital important to SCS. Employment conditions offered to employees will at least meet minimum requirements of national legislation and relevant ILO conventions.

- We provide a safe and healthy working environment and are committed to continual improvement.
- We provide equal opportunities to people without regard to race, colour, gender, nationality, religion, ethnic affiliation or other distinguishing characteristics. We do not allow discrimination or harassment.
- We provide means for employees and other persons involved with SCS to report legitimate concerns and grievances in a manner that ensures proper review and action, without retaliation.
- We recognise employees' rights to form or join trade unions in accordance with applicable national laws and principles.
- We provide training and education opportunities for employees that support their current and future work plans
- We do not employ any person below the age of 15 or applicable higher legal minimum age.
- We do not use forced labour, slave labour or other forms of involuntary labour at our work sites. We do not allow any practice that would restrict free movement of employee.

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Behaviour in our marketplace

A strong and consistent relationship with all employees built on mutual respect and dignity, is of vital importance to SCS. Employment conditions offered to employees will at least meet minimum requirements of national legislation and relevant ILO conventions.

- We shall not act contrary to applicable competition laws.
- We shall not, directly or indirectly, offer or give any undue payment or other consideration to any person or entity for the purpose of inducing such person or entity to act contrary to prescribed duties in order to obtain, retain or direct business or to secure any other improper advantage on the conduct of SCS's business.
- We shall not, directly or indirectly, solicit or accept any undue payment or other consideration that is given for the purpose of inducing us to act contrary to prescribed duties.
- We record the correct nature of all financial transactions by recording them in accordance with locally Accepted Accounting Principles and in Executive Committee reporting follow International Financial Reporting Standards (IFRS) and applicable SCS Policies and Rules.
- We have controls in place in our IT procedures to ensure adequate levels of data protection for our clients.

Environment

Based on the strong belief that project development and construction related services can make a major contribution to a more sustainable world, SCS is committed to proactive environmental management at all levels.

- We maintain organisational structures, management systems, procedures and training plans that as a minimum ensure compliance with all relevant laws, regulations and standards.
- Our Environmental Management System will be is certified in accordance to ISO 14001. Since line management is responsible for our environmental performance, it is integrated into core business processes and plans.
- In a spirit of continual improvement, we involve our workforce in the process of environmental management including subcontractors, partners and other interested parties.
- Our ambition is to continually improve the environmental credentials or our projects, products and services by actively looking for ways to reduce negative environmental impacts during their entire life cycle.

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Document no.: 1MCo3-SCJ-PR-POL-Soo1-000001

Revision:Co1

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: Skanska Signed: Signed: Signed: Signed: Signed: Signed: Signed: Stanska Strabbase Strabb

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

Signed: James Richardson (Oct 12, 2020 17:46 GMT+1)

James Richardson, Managing Director