

1MCo3 Main Works

SCS Code of Conduct

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SCS Code of Conduct

Together, Skanska, Costain and STRABAG Joint Venture, High Speed Two (HS2) and our partners are an integrated Project Team, delivering the HS2 London Tunnels.

The way we go about delivering our work is as important as the result. The SCS Code of Conduct reflects how we work as a project, how we treat others and how we are expected to behave.

It consists of two elements: our Values and our Code of Conduct. These form the foundation of what you are responsible for and what is expected of you at work.

Message from the Managing Director

At SCS, we are committed to doing the right things in the right way and acting with integrity and respect. We are dedicated to building trust with HS2, JV partners and suppliers to achieve long-term health and performance of our project. As part of the HS2 development, we are also responsible for delivering the project in a way that meets the public's expectations.

Our reputation as a project is of the highest importance to HS2, our JV Board and our Project Management Team. The actions we take every day impact our brand and reputation. Our Code of Conduct and our Values combined define what we stand for and serve as guidance for our actions.

The SCS Code of Conduct provides guidance on how we should do things, ensuring we behave ethically and legally. It helps us decipher the correct way to proceed in our work and gives us a direction to make the right decisions to deliver a successful and sustainable project. The Code of Conduct helps build the right behaviours for doing things and enabling good judgement. It will not have the answer for every situation, so whenever you face an ethical dilemma or are not sure what to do, just ask.

Speak up if you do not understand, or if something does not seem right or conflicts with the SCS way of working.

Jonathan Morris

Managing Director SCS JV

1. What is our Code of Conduct?

1.1 Overview

- 1.1.1. It is important that we all comply with laws and regulations that apply to our business practices. Our policies and procedures are designed to help us meet our obligations. It is the responsibility of each of us to follow and report any concerns should you feel that these high standards are not being met.
- 1.1.2. Our standards are applicable everywhere we do business. Occasionally, there can be a conflict between the rules of the joint venture and our JV partners. Where this occurs, the strictest standard will always apply. If you are in any doubt, please consult your people manager or the Ethics and Compliance Team.

1.2 What do we all need to do?

- 1.2.1. Everyone working at SCS JV should act with honesty and integrity and is expected to live the SCS JV values.
- 1.2.2. We should be familiar with this Code of Conduct. Complying with this Code of Conduct is an obligation for every member of staff.
- 1.2.3. SCS JV strives for better performance and working culture, we encourage a **"speak up"** culture and we expect everyone to call out any wrongdoing.
- 1.2.4. Supervisors and managers are expected to set an example for their team, creating an open culture where people can raise concerns without fear of retaliation, and helping them to understand the Code of Conduct. We encourage managers to entrust their team members to make decisions, and also to verify their approach and understanding.
- 1.2.5. We promote a culture of recognising staff who do the right thing.
- 1.2.6. Everyone must be cooperative in any ethical or internal SCS JV investigations.

1.3 Guidance for decision-making

- 1.3.1. If you are in a situation where you are unsure, you should ask for guidance from your manager, People Team or Ethics and Compliance Team.
- 1.3.2. When making decision, ask yourself:
 - Is it in line with our values, policies, procedure and Code of Conduct?
 - Is it legal?
 - Am I comfortable with my decision?
 - Would I be happy reading about this in the newspaper or on social media?
 - Could I explain my decision to colleagues, family or friends?

1.4 What happens if I do not follow the Code of Conduct?

- 1.4.1. The consequences can be serious. Violation of the Code of Conduct could result in your removal from the SCS JV project and/or disciplinary action by your parent company.
- 1.4.2. Uncooperative behaviour during an SCS JV internal investigation may result in your removal from the SCS JV project and/or disciplinary action by your parent company.
- 1.4.3. Breaching this Code of Conduct could also damage the reputation of SCS JV, HS2 and the JV partners. SCS JV and the JV partners may also be liable to significant fines and/or penalties.

1.5 Our Values

- 1.5.1. Our Code of Conduct aligns with our values:

- **Love for Life** – We care and take responsibility for the well-being of the HS2 family, our people, our families, and the communities and environment in which we all live and work. We are safe at heart, working safely or not at all.
- **One Team Spirit** – We work collaboratively as one team towards a common goal. We build trusting relationships. We celebrate diversity in our team, recognising and rewarding our people.
- **Passionate about Excellence** – We are committed to supporting each other to do things right first time in everything we do. We strive to continuously improve and capture best practice and learn lessons. We are open to new ideas. We work with our people and our supply chain to innovate and embrace new technology.
- **Leadership** – We empower all our staff to lead by example. We are what we do, not just what we say. We will create a high-performing environment where our people feel engaged and motivated to do their best work.
- **Act with Integrity and Respect** – We act with integrity and show respect for each other. We hold ourselves to account and always do the right thing. We create an ethical and open culture. We are mindful of our actions and consider their impact upon others. We resolve conflict by acting flexibly, listening and being open-minded.

1.6 Who does it apply to?

- 1.6.1. The SCS JV Code of Conduct applies to all SCS JV partners and their officers, directors, and employees (whether permanent or temporary) including advisers and consultants.
- 1.6.2. SCS JV's supply chain partners are covered under the SCS JV Supplier Code of Conduct.

2. Raising concerns

2.1 How do I raise concerns?

- 2.1.1. At SCS JV, we promote a culture where our staff, contractors, suppliers and other stakeholders can “speak up” without fear of retaliation if they wish to raise a concern.
- 2.1.2. In the first instance, you should raise concerns with your line manager. There may be times when this is not possible, in which case the matter should be raised with a different manager, the People Team or the Ethics and Compliance Team.
- 2.1.3. Sometimes there may be situations where you may not feel comfortable raising a concern, or you wish to remain anonymous. In these circumstances you can report your concerns confidentially, and anonymously if preferred, via our whistleblowing reporting routes either online at [EthicsPoint - Skanska Costain Strabag Joint Venture](#), or by calling EthicsPoint on 0800 949 6470.
- 2.1.4. Confidentiality will be respected at all times and your identity will be protected should you wish to remain anonymous, in line with legislation.
- 2.1.5. For more information regarding reporting concerns, please refer to our Whistleblowing Policy which is available on the intranet.

2.2 What should I report?

- 2.2.1. You should report any concern where you suspect or know that there has been a breach of the SCS JV Code of Conduct, an SCS JV policy or a process, or a law.
- 2.2.2. For example, suspicions or knowledge of bribery, fraud, bullying and harassment, serious health and safety breaches, misuse of SCS JV’s property, or incidences of modern slavery.

2.3 After a report

- 2.3.1. Reports to EthicsPoint will be acknowledged within two working days and you may be asked for more information regarding the matter you have raised. An investigation may then be conducted in accordance with the SCS investigations process.
- 2.3.2. Investigations will be independent, impartial, and focused on establishing facts. At the end of an investigation, there may be recommendations made based upon the findings, including remedial action and potential disciplinary proceedings.
- 2.3.3. It is not always possible to share the full outcome of an investigation with the person who made the report, however you will be informed that the matter has reached a conclusion.

2.4 Retaliation

- 2.4.1. To create our “speak up” culture, it is very important that you feel comfortable raising your concerns, whether directly to a manager, or through the People team, the Ethics and Compliance Team, or via EthicsPoint. We want to hear about concerns so that we can deal with them in the right way, by investigating, taking corrective actions and learning from any findings.

- 2.4.2. Staff, suppliers and other stakeholders should feel able to report any misconduct. In accordance with the Public Interest Disclosure Act 1998, individuals who report a suspected misconduct in good faith, shall not be subject to retaliation or disciplinary action by their employer.
- 2.4.3. SCS JV has a zero-tolerance approach to retaliation against people who have raised concerns in good faith. Any suspected retaliation must be reported to a line manager, the People Team or the Ethics and Compliance Team.

2.5 Malicious reporting

- 2.5.1. Reporters will not be liable for disciplinary action if they report a genuine concern, based upon what they have seen or heard, that is subsequently found to be incorrect.
- 2.5.2. However, we do not accept reports raised with malicious intent. Individuals may be removed from the project and referred to their employer for potential disciplinary action if they deliberately make false allegations or provide information that they know is not true.

3. Fraud, bribery and corruption

3.1 Bribery and corruption

- 3.1.1. We must follow the UK laws and relevant legislation in the places where we operate.
- 3.1.2. Offering, promising, giving, requesting, receiving or accepting bribes is contrary to the Bribery Act 2010, and is strictly prohibited within SCS JV. We must not offer bribes as an inducement to, or reward for, acting in our favour, obtaining or retaining business or securing an advantage. We must not accept bribes from anyone in an attempt influence our decision in relation to SCS JV's business.
- 3.1.3. Bribes can be in the form of money, gifts, favours, rebates, charitable donations, sponsorship, a job offer, tickets to any type of event, or anything that is valuable to the recipient.
- 3.1.4. Any person entrusted with authority can be a subject of bribery. We should be careful in exercising our authority and should not abuse our power to show favour or circumvent standard procedures or policies.
- 3.1.5. Bribery and corruption are criminal offences. SCS JV may also be liable under the corporate offence of failure to prevent bribery, if bribery is found to have occurred within the SCS JV.
- 3.1.6. For more information, please refer to our Anti-Bribery Policy which is available on the intranet.

3.2 Gifts and hospitality

- 3.2.1. We adopt a strict approach on the offering or receiving of gifts and hospitality. However, from the point of view of business operation, cultural or custom consideration, a general permission is given to SCS JV staff to accept gifts and hospitality under £15 such as branded marketing products, modest business meals or attendance of industry or award events.
- 3.2.2. All gifts and hospitality over £15 must be declared in the Gifts and Hospitality Register, irrespective of whether they are accepted or declined. The acceptance of gifts and hospitality valued between

£15-£50 must be approved by line managers. Gifts and hospitality above £50 must be approved by line managers and the Ethics and Compliance Officer.

- 3.2.3. No gifts or hospitality are permitted from consultants or suppliers, or any organisation in an active tender and/or during the course of a procurement process.
- 3.2.4. All hospitality offered must be for specific business purposes only and should be reasonable, not luxurious, and in a suitable place for the event. Invitations to sporting events, concerts, galas or similar occasions must be refused, and a record of the offer recorded on the Gifts and Hospitality Register.
- 3.2.5. For more information, please refer to our Gift and Hospitality Policy which is available on the intranet.

3.3 Interactions with Government Officials

- 3.3.1. When working with government officials, we must not offer any gifts and/or hospitality. We should not do anything to inappropriately impact the performance of their duties.
- 3.3.2. We are not permitted to make "facilitation payments" to public officials to speed up the performance of a routine procedure or process.

3.4 Donations

- 3.4.1. We support our communities and encourage donations and volunteer works. However, we are careful with any donations. We do not carry out activity where it would give the impression we are behaving inappropriately. The charities we support should be subject to conflicts of interest and due diligence checks.
- 3.4.2. For more information, please refer to our Charity Policy which is available on the intranet.

3.5 Conflicts of interest

- 3.5.1. A conflict can occur when a person is having to make a business decision, such as supplier selection, and there is the potential for their decision to be perceived as conflicted due to the nature of their role or their direct employment arrangements. Examples include, but are not limited to:
 - Financial, such as:
 - full or part ownership of a supplier or customer
 - owning shares or any interests with the supplier or customer
 - owning assets or properties that derive income from SCS.
 - Previous or current working relationship with a competitor, supplier, or customer that might affect, or be perceived to affect, a person's business decision making.
 - Personal relationships, like a conflict arising from close relatives, family members or friends being involved in one of our business transactions or staff recruitment decisions.

- Holding memberships, or a decision-making position, within associations or organisations with an interest in SCS's business activities, such as pressure groups or professional bodies.
- 3.5.2. It is important to be open and transparent when we are managing potential conflicts of interests. Having a conflict of interest in SCS is not considered misconduct, but you may be liable for disciplinary action if you fail to declare a relevant conflict of interest.
- 3.5.3. SCS's approach to conflicts of interest is to manage them. A conflict of interest may be actual, potential, or perceived. A conflict of interest must be declared as soon as practicable (and in all cases within five working days) via the [Conflict of Interest Declaration form](#). The SCS Ethics & Compliance Officer will record reported conflicts in the Conflict of Interest Register. Appropriate action will be taken to manage the conflict of interest.
- 3.5.4. For more information, please refer to our Conflict of Interest Policy which is available on the Intranet and AssetWise.

3.6 Fraud and dishonesty

- 3.6.1. SCS JV is committed to maintaining the highest legal, ethical and moral standards and we expect the same from all staff and suppliers. We demonstrate uncompromising honesty and integrity in everything we do.
- 3.6.2. We have a zero tolerance to fraud. It does not matter whether the fraudulent act is for personal gain, or for the benefit of the SCS.
- 3.6.3. You are prohibited from practising any fraudulent acts to circumvent any standard procedures.
- 3.6.4. Any unauthorised destruction, falsification or amendment of documents and records is strictly prohibited.
- 3.6.5. Anyone committing fraud is liable to criminal prosecution; fraud includes (but is not limited to) the following offences:
- Offences under the Fraud Act 2006 of: fraud by false representation; fraud by failing to disclose information; fraud by abuse of position; participation in a fraudulent business and obtaining services dishonestly;
 - Offences under the Theft Act 1968 of false accounting and false statements by company directors;
 - Offence of fraudulent trading under the Companies Act 2006; and
 - Offence under common law of cheating the public revenue.
- 3.6.6. Supervisors and managers are expected to play a role in the prevention and detection of fraud, such as identifying fraud risks in their business areas, developing controls to prevent and detect fraud and ensuring the controls are effectively enforced.

- 3.6.7. SCS JV and JV partners may also be liable to prosecution under the Economic Crime and Corporate Transparency Act 2023 for the offence of failure to prevent fraud.
- 3.6.8. You must cooperate with any SCS JV ethics investigation, providing information if requested by the Ethics and Compliance Team.
- 3.6.9. For more information, please refer to our Anti-Fraud Policy and Response Plan which is available on the intranet.

4. Promoting a fair and responsible business culture

4.1 Anti-competitive behaviour

- 4.1.1. We strive to deliver our project by competing fairly, behaving ethically, and living our values. We must also respect competition and antitrust laws including the Competition Act 1998 and the Enterprise Act 2002.
- 4.1.2. We prohibit SCS JV and suppliers from engaging in any anti-competition practices or entering any agreement between businesses which restricts competition such as covering pricing, bid rotation, bid suppression, sharing pricing information, or abuse of dominant market positions.
- 4.1.3. Pricing, technical information, geographical ownership or control of a market or other sensitive issues obtained in tendering process are confidential information and must not be disclosed to other competitors.
- 4.1.4. If there has been potentially anti-competitive behaviour in SCS JV, please report it to the Ethics and Compliance Team.

4.2 We act fairly to suppliers

- 4.2.1. We act fairly to all suppliers and promote a fair and open competition when selecting suppliers in order to bring the best value to the project.
- 4.2.2. We implement a robust recruitment procedure and due diligence process when engaging suppliers.
- 4.2.3. SCS JV encourages communication with suppliers to improve work performance and report any irregularities.

4.3 Transparency and records

- 4.3.1. We value the communication among the stakeholders of the project, and we expect the business information to be full and accurate. Staff are obliged to maintain proper and accurate records in relation to their work.
- 4.3.2. Documents and records are important for audit trails to identify shortcomings, as well as provide accountability for continuous performance improvement. Supervisors and managers are expected to ensure effective documentation controls are in place.

4.4 We maintain quality work

- 4.4.1. We aim to deliver high working standards and meet the performance requirements and regulatory obligations. We do not accept sub-standard products, equipment, resources and designs on the project.
- 4.4.2. Appropriate testing and inspection procedures should be in place to ensure the quality of our work. Any falsification or amendment of any records of work or materials, or any dishonest act to conceal any defects or deviations is strictly prohibited.

4.5. Trade sanctions

- 4.5.1. Sanctions and embargoes are tools used by governments to implement their foreign policy objectives. This can include fighting terrorism, controlling nuclear development programs, or trying to improve human rights. They can be targeted at individuals, companies, and sometimes entire countries.
- 4.5.2. If an individual, company or country is on a sanction list applicable to SCS JV then we cannot do business with them. The penalties for breaching sanctions for both the company and the individuals involved are severe, including both financial penalties and imprisonment.
- 4.5.3. Thorough due diligence processes will be conducted to ensure we do not engage any sanctioned entities.
- 4.5.4. For more information, please refer to our Sanctions Policy which is available on the intranet and AssetWise.

4.6. Money laundering

- 4.6.1. Money laundering is the process of concealing the source of money generated from illegal activities. We must comply with anti-money laundering rules and be careful with the source of funds when engaging suppliers.
- 4.6.2. Thorough due diligence process will be conducted to ensure we do not engage entities which cannot provide legitimate proof of funds.

5. Respecting human rights and each other

5.1 Bullying & harassment in the workplace

- 5.1.1. People are at the heart of our organisation, our values include Love for Life, One Team Spirit, and Act with Integrity and Respect. These values are expected from all staff, whether working together inside SCS JV or working with contractors and suppliers. This includes having respect for laws, working conditions and human rights, wherever we operate.
- 5.1.2. You must treat everyone with respect and encourage others to do so. We do not tolerate obstructive behaviour such as fighting, bullying, harassment of any kind, threatening behaviour, acts of ridicule, using offensive or abusive language, and spreading malicious rumours, etc.

- 5.1.3. We do not tolerate any form of bullying or harassment against our people, including via social media. All of our colleagues are entitled to carry out their duties without fear of being harassed or bullied.

5.2 Discrimination

- 5.2.1. We are a diverse organisation with many different cultures working together to achieve our goals. We must work together without treating people negatively because they are different.
- 5.2.2. We do not tolerate discrimination against others based on their gender or gender identification, sexual orientation, age, disability, religion, nationality, marital status, race or creed and any other characteristic that is protected by law.
- 5.2.3. All members of our workforce, suppliers and partners deserve to be treated with dignity and respect. Treat people how you wish to be treated.

5.3 Modern slavery

- 5.3.1. Modern slavery includes the use of workers against their will, or who are underage, vulnerable or are forced to work in unacceptable conditions.
- 5.3.2. We do not tolerate any form of modern slavery, human trafficking, forced or compulsory labour and any practices that would restrict the free movement of employees, including unlawfully withholding wages, worker-paid recruitment fees, compulsory overtime, bonded labour and confiscation of identification documents.
- 5.3.3. No form of modern slavery is acceptable in our operations or supply chain.
- 5.3.4. You are encouraged to report any suspicious modern slavery practices.
- 5.3.5. For more information, including details on how to report any concerns, please visit [Unseen UK](#). For more information, please refer to our Modern Slavery and Human Trafficking Policy which is available on the intranet and via AssetWise.

6. Health, safety and wellbeing

6.1 Health and safety

- 6.1.1. Wherever we operate, we do our best to make sure our business practices do not injure or cause damage to anyone. Keeping our people, partners, and suppliers safe and well is of the utmost importance.
- 6.1.2. Everybody at SCS JV must make sure that we perform our duties whilst complying with health and safety standards. You have the right and obligation to stop unsafe work and report health and safety concerns.
- 6.1.3. You must also cooperate with any health and safety investigation and the implementation of health and safety measures.

- 6.1.4. SCS JV will follow all regulations and legal requirements in relation to health and safety as well as our own internal processes. We apply the stricter standard when there is a difference.
- 6.1.5. We ensure adequate training, as well as sufficient and proper equipment are provided to carry out works safely.
- 6.1.6. Reasonable steps and procedures should be in place to ensure individuals who enter SCS JV sites are not under the influence of drugs or alcohol or a health condition. Any concerns should be reported to your line manager at the earliest opportunity.

6.2 Fair working conditions

- 6.2.1. We recognise the Universal Declaration of Human Rights of the United Nations and prohibit any form of human right violations. We value the welfare of our staff, and we ensure SCS JV staff have a fair contract with fair wages, working hours, benefits and working conditions which comply with applicable laws, regulations, and relevant International Labour Organisation Conventions.
- 6.2.2. SCS JV adopts a fair and transparent recruitment process in line with relevant legislation and standards.
- 6.2.3. We recognise staff rights to form or join trade unions in accordance with applicable laws and regulations.
- 6.2.4. SCS JV staff should note that this Code of Conduct does not relate to matters regarding their employment contracts. Such concerns should be raised through your relevant JV partner's grievance procedure (or the procedure relevant to your contract of employment). All matters will be properly investigated under the appropriate process.

7. Information and data

7.1 Data protection

- 7.1.1. At SCS JV, we are committed to processing and holding the personal data of our staff, suppliers, and customers in accordance with all laws relating to data protection, the processing of personal data, privacy and/or electronic communications in force from time to time in the UK, including the GDPR and the Data Protection Act 2018. Data breaches could lead to significant fines for SCS JV.
- 7.1.2. We protect the confidential and private details of our organisation, people, and HS2. The key principle is to always keep data safe and secure and think about how you would want things done if the data was about you.
- 7.1.3. SCS JV prohibits its staff from releasing personal or sensitive business data without a valid legal or business reason to any person or organisation. This includes electronic, written or verbal communications. See also 'Insider Trading' at section 7.2.
- 7.1.4. The way in which we control, collect, store, and process data is important. Maintaining accurate records is a key defence should SCS JV be investigated by a regulator or law enforcement agency.

- 7.1.5. Information and data should be kept for no longer than necessary for our business needs, such as to meet certain legal or HR requirements.
- 7.1.6. Data privacy must be considered in the performance of our normal duties and what we are doing when we collect, use, retain and disclose personal data.
- 7.1.7. We must be transparent about how personal data is used and we must safeguard it to the best of our ability.
- 7.1.8. We must be aware of cyber security and must not use company IT devices for inappropriate communication or usage.
- 7.1.9. Staff should stay alert to any suspicious activities, such as phishing and social engineering attacks.
- 7.1.10. Any loss, theft, or unlawful disclosure of data must be reported to the Data Protection Officer at dataprotection@scsrailways.co.uk
- 7.1.11. For more information, please refer to our Data Protection Policy - which is available on the intranet and AssetWise.

7.2 Insider trading

- 7.2.1. SCS JV has JV Partners that are listed on public stock exchanges. As a result of this, our JV partners' share price can be impacted by the unauthorised release of confidential information to the public.
- 7.2.2. It is illegal to make use of non-public information about SCS JV, JV partners or SCS JV's suppliers to trade securities or shares. This includes the trading of shares of the JV partners, and the shares of SCS JV's suppliers.
- 7.2.3. Staff who have left the SCS JV project are also bound by this requirement and are prohibited from using non-public information to secure inappropriate benefits.

7.3 Confidential information

- 7.3.1. Confidential information must be treated as such and only communicated on a need-to-know basis.
- 7.3.2. 'Confidential Information' includes any information of whatever kind (whether commercial, technical, financial, operational or otherwise, in whatever form and whether or not recorded in any way) relating to the SCS JV, HS2, or the project.
- 7.3.3. Confidential Information should be encrypted with a password. Passwords and access to IT systems must be kept confidential.
- 7.3.4. The unauthorised disclosure or use of Confidential Information either internally or externally will result in an investigation and, if appropriate, removal from the project and potential disciplinary action by their employer.
- 7.3.5. If you are unsure about whether information is confidential or not, consult your line manager or the Legal Team or the Data Protection Officer.

8. We Protect SCS JV and JV Partners Assets

8.1 Misuse of assets

- 8.1.1. Assets of SCS JV and the JV partners include tangible assets such as raw materials, motor vehicles, equipment, machines, plant, computers, real estate and intangible assets such as brands, patents, trademarks, trade secrets and copyrights.
- 8.1.2. We are all required to act responsibly with such assets to make sure they are used for their intended purpose. Unauthorised use of assets is prohibited.
- 8.1.3. You should not have any expectation of privacy when using SCS JV systems, even for non-work-related activity, unless local laws say otherwise.
- 8.1.4. You are obliged to report any misuse or damage of assets.

8.2 Theft of assets

- 8.2.1. SCS JV manages several sites with valuable materials and assets. Everyone has the duty to look after the assets.
- 8.2.2. Supervisors and managers are expected to implement effective controls to protect the assets. Regular auditing or record keeping of inventories or physical assets are encouraged.
- 8.2.3. Theft is a criminal offence. Anyone found to have stolen property belonging to the SCS JV may be reported to the Police, which could result in prosecution (which may result in fines or imprisonment), as well as disciplinary action by their parent company or employer.
- 8.2.4. You are obliged to report any loss or theft of assets to either the SCS JV Security Team or the Ethics and Compliance Team via the EthicsPoint reporting line.

8.3 Security

- 8.3.1. SCS JV intends to ensure that all SCS areas of work are safe and secure.
- 8.3.2. SCS JV reserves the right to search any person or vehicle upon entering, or leaving, any of its offices, work areas or projects.
- 8.3.3. For more information about search levels and examples of items which are prohibited from being brought on to site please refer to our Site Access and Security Lot S1 & S2 which is available on AssetWise.
- 8.3.4. Possession (or awareness) of prohibited items on site may result in an investigation, removal from the project and, if appropriate, disciplinary action by your employer.

9. Appendices

Useful Supporting Documents	
Anti-Bribery Policy	Anti-Fraud Policy and Response Plan
Whistleblowing Policy	Gifts and Hospitality Policy
Modern Slavery Policy	Sanctions Policy
Conflict of Interest Policy	Site Access and Security Lot S1 & S2
Charity Policy	Data Protection Policy

10. Conclusion

- 10.1.1. This Code of Conduct will be reviewed annually to ensure the management system is suitable, effective, consistently implemented and continually improved to meet the requirements of the SCS JV and HS2.
- 10.2.1. Compliance with this Code of Conduct is mandatory. Any SCS JV staff found to be in breach of this policy will be referred to their relevant employer parent company, where disciplinary action may be considered.

Approved by the SCS JV Board

Signed: Dave Astbury
Dave Astbury (May 18, 2026 07:58:48 GMT+1)

Date: 18/05/2026

Skanska Construction UK Ltd.

Signed: P. Jones

Date: 12/05/2026

Costain Ltd.

Signed: Andrew Dixon
Andrew Dixon (May 14, 2026 09:14:33 GMT+1)

Date: 14/05/2026

STRABAG AG

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

Signed: Jonathan Morris Date: 12/05/2026

Jonathan Morris, SCS JV Managing Director