

AUREOS

CODE OF
CONDUCT

DOING THE RIGHT THING

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Darren

Trust is one of our most valuable assets. And it's also one of the most fragile. One major incident, one negative news story, one careless comment, and the trust we've worked so hard to earn can be lost.

That's why the way we conduct our business is as important as the services we provide. Our Code of Conduct is here to help us do that. It sets out the principles that guide our everyday decision-making, to ensure we operate our business responsibly, and maintain that hard-earned trust.

We expect everyone to read our Code, encourage your teams to do the same, and complete the training that supports it. We encourage everyone to strive to comply with the spirit of 'The Code' and to know that you will always be supported if you endeavour do the right thing. Speak up if you have a concern or see something wrong and seek guidance anytime you are unsure about what the right thing to do actually involves.


We expect nothing less from our business partners, including our consultants, distributors and suppliers, as well as our subsidiaries and joint venture partners – we understand the responsibility we have to communicate with them about our high standards of integrity to ensure they uphold our standards when they interact with or represent us.

Our Code is a valuable resource, but it doesn't cover every situation you may face on the job, so it's important to use good judgment in everything you do and to ask for help if you're ever unsure about the right course of action. By acting and working together as one, we know we'll continue to ensure our business is worthy of the trust that all our stakeholders place in us.

Supporting the principles of the UN Global Compact

Aureos supports the ten principles of "Human Rights, Labour, Environment, and Anti-Corruption" advocated by the United Nations Global Compact, and endeavours to practice them through all our business activities. These ten principles are in common with the Group's Code of Conduct herewith, which sets out corporate responsibility for society and the environment.

What is The Code of Conduct?



The Code of Conduct sets out a clear set of standards for our behaviour as a business, and helps all of us individually to do the right thing, no matter what situation we find ourselves in. It provides practical guidelines on how to comply with, get further information, or raise issues relating to 'The Code'.

Our Code is important. By following these ethical business standards, we are all helping to enhance and maintain Aureos' core purpose... building a business where our people thrive; whilst upholding our commitment to act fairly and responsibly with all stakeholders at all times.

Complying with 'The Code' is mandatory, in both spirit and letter constituting a personal commitment we expect everyone working at Aureos to uphold, every day.

Our core purpose and values

OUR CORE PURPOSE IS:

Building a business where our people thrive

OUR VALUES



Health, safety and wellbeing

At Aureos, health, safety and wellbeing are at the heart of everything we do. Those who work for us and with us have the right to be treated safely, respectfully and with integrity. Therefore, we will never compromise on maintaining the highest standards of safety, health and wellbeing. This constitutes our licence to operate, is fundamental to our reputation and underpins our confidence in the long-term success of the business.



Relationships

Our interactions with clients, key stakeholders and each other ultimately determine the success of our business and the strength of our reputation. We respect each other, our suppliers, our customers, our partners, our communities and society. We communicate openly with each other and we listen. We engage openly and transparently to build long-term, value-based relationships where we are trusted to deliver.



Can-do attitude

We always deliver on our promises. We are committed to realising our purpose and strategy through working in a united way. Our people and our processes work together in a connected and seamless manner for the benefit of our customers. Many of our projects are set within complex built and infrastructure environments, and are often procured under highly regulated commercial conditions. We never underestimate the expertise and experience required to meet these commitments.



People

Our people are at the heart of our business. Delivering value for our customers, partners and key stakeholders is the focus of everything we do. We strive to deliver outstanding performance and generate excellent results. That is why we invest significantly in training and development to maintain a highly productive and positive workforce. The attraction, development and retention of construction and engineering skills remains a priority for Aureos and the wider industry.



Innovation

We take an innovative approach to everything we do. We combine our skills and energies to deliver the best possible solutions. We are one of only a handful of genuine construction pioneers bringing about real change in the industry. As a direct result of our close collaboration with academia and manufacturing partners, we are attracting new talent into our industry and transforming construction processes in line with Government construction strategy.

Who does 'The Code' apply to?

'The Code' applies to all employees of Aureos, including temporary and agency colleagues working in every sector and region where we do business.

Our managers are responsible for providing leadership and support to their teams in promoting 'The Code', building understanding of the requirements of 'The Code', how to apply them in practice, and monitoring their compliance.

Every employee at Aureos however has a personal responsibility to carefully read and understand, comply fully with the standards set out, and report any issues or concerns relating to any suspected breaches of 'The Code'.

We also expect all those who work in our joint venture and alliances to follow and uphold all of the standards set out within 'The Code'. We expect our subcontractors, suppliers, affiliates and agents acting on behalf of the company to uphold similar values to ourselves.



How does 'The Code' work?

'The Code' clearly explains how to do the right thing in line with our purpose and values in a number of important circumstances. 'The Code' provides a clear explanation of the standard of conduct that is acceptable in different situations, what we must avoid doing, and what to do if you have a concern.

However, 'The Code' can only take you so far. It does not cover every law or situation that could apply to you in your daily activities. However, it does provide you with a framework to be able to make the necessary enquiries and raise the appropriate questions to give you confidence that you are doing the right thing. If you are still in doubt as to whether a particular course of action is right or wrong, then ask yourself the following questions:

01

Is it consistent with our core values?

02

Does it seem the right thing to do?

03

Is it fair and honest?

04

Does it reflect well on Keltbray Infrastructure Services' reputation?

05

Would you be happy to see it appear in the media?
What would be the reaction of colleagues?



If you are ever unsure what to do, please ask your manager or another colleague for advice

How to report a Code breach



If you have a concern or you think that a breach of 'The Code' might be taking place, it is important that you speak up about it.

Speaking up early could protect you from serious legal consequences; avoid damage to the company's reputation and even save someone's life. We will never penalise anyone for reporting a breach in good faith, even if their suspicions prove to be unfounded.

What to do

If you are aware of a breach of 'The Code', or if you are suspicious that a breach is taking place, you must report it. There are a number of different ways you can raise a concern or receive help and advice. Choose whichever route you feel comfortable with, or which best suits the particular situation.

- i. Report the issue to your line manager or supervisor
- ii. Any Managing Director or above throughout Aureos
- iii. Report your concern to your Line Manager and/or email **concerns@ aureos.com**
- iv. Report the issue to our General Counsel or to the Support Services Director
- v. Report the issue by emailing **concerns@ aureos.com**, our confidential reporting service. This is a securely administered service, ensuring impartiality and confidentiality

All reported breaches will be investigated appropriately and with due consideration of a person's wish for anonymity. Depending on the circumstances, the results of an investigation may include disciplinary action up to and including dismissal. Ultimately, findings will be reported to our Senior Leadership team. If a crime is found to have been committed, the investigation team will contact the police who may initiate legal proceedings.

It should also be noted that the same levels of disciplinary action can also result from an individual reporting a potential Code breach in bad faith, as an act of prejudice, malice or any other wrongful motivation.





Aureos supports the UNGC's fundamental areas of environment, human rights, labour, anti-corruption by...

Explaining their significance – "What this means"

Guiding employees on how to incorporate these principles into their daily responsibilities – "Making it personal"

Outlining clear directives for appropriate and inappropriate actions – "We will always/We will never"

Supporting material can be found in our Sustainability policy –
Ref: INF-CAL-PCY-001

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Section 1 Social and environmental responsibilities

We are committed to operating a sustainable business that complies fully with the social, economic and environmental laws and regulations, alongside developing stringent standards of our own.

IN ESSENCE, WE WILL:

- Care about our people, our communities and the environment we work in
- Comply with the relevant laws and permits where we operate and apply our own standards if we believe they exceed the minimum set by others
- Commit to developing high quality products and services as part of our strategy to help transform construction into a modern, progressive and sustainable industry



ASSOCIATED GROUP POLICIES:

- Health, safety and wellbeing
- Environmental
- Sustainability and CSR
- Sustainable timber procurement
- Energy management
- Community investment

THIS SECTION COVERS:

- Health and safety
- Environmental sustainability and ethical sourcing
- Respecting communities
- Charitable and not-for-profit organisations



Health, safety and wellbeing

OUR CODE

The health and safety of everyone involved in and affected by our operations is our primary focus. We believe it is central to the sustainability of the business and we will never compromise on it.

WHAT THIS MEANS

At Aureos, no other matter – commercial or operational – takes precedence over the health and safety of those involved in or affected by our activities. We are totally committed to creating a culture free of incidents and injuries, and are seeking to achieve an Accident Frequency Rate (AFR) that stands alongside industry leading levels. We will achieve this through the flawless applications of our self-delivery business model.

We have an established health and safety governance and compliance infrastructure which guides everything we do. This highly successful behavioural safety approach is backed by a pipeline of investment at every level – from the product and process innovations that remove risks from our activities to the medical interventions that support the wellbeing of our workforce.

Making it personal:

To make safety and security personal to you:

- Make safety practices an integral part of the way you work, not an after-thought
- Ensure you always adhere to and comply with the safe methods of working and other safety guidelines
- Maintain high standards of housekeeping on site and in offices
- Acknowledge that you have a responsibility towards your own health and safety, and that of your colleagues and the public affected by your work
- Speak out against unsafe practices
- Lead by example, demonstrating a positive attitude to health and safety, and inspiring others to follow
- Stop any activity that you think could be unsafe, regardless of who has asked you to complete the task

We will always:

- Strive to ensure that everyone who comes to work for us goes home safe and healthy each day
- Proactively seek to minimise any negative impacts from our works
- Protect the health and safety of site personnel, visitors and the public
- Encourage stakeholders to take active steps to create safe working environments
- Challenge and report anything we believe is unsafe or compromises our Code

We will never:

- Put other business objectives before safety
- Bend the rules or contravene our Safety Management System policies and procedures
- Accept the prevailing view that construction is inherently dangerous which means that it is acceptable to expose people to high levels of risk
- Assume that health and safety is someone else's responsibility

Pause for a second!

Would you ever...?

- ... come to work in a state that could compromise your own or someone else's safety?
- ... operate plant or machinery without completing the safety checks?
- ... let time pressures lead you to compromise safety by taking a short-cut?
- ... ignore an unsafe situation when you know you should have reported it to a supervisor, line-manager or anonymously?

Environmental sustainability and ethical sourcing



OUR CODE

Everything we do has an impact on the environment; we will apply rigorous standards to make a positive contribution to environmental protection wherever practical.

WHAT THIS MEANS

We care deeply about the world we live and work in, and strive to improve it in the things we do and the structures we deliver. We are committed to the principles and practices of sustainability and seek to balance the social, environmental and economic impacts of our activities, while adhering to stringent standards to make a positive contribution to environmental protection.

Making it personal:

To ensure you comply with our Code:

- Familiarise yourself with our general policies and any specific guidelines applying to your project
- Comply with environmental legislation and other associated requirements
- Always follow the correct procedures for handling or disposing

We will always:

- Prevent pollution and demonstrate a positive impact on the environment in all our activities as well as those of our supply chain partners
- Prioritise the use of materials and services with the lowest environmental impact, and with consideration of non-hazardous, renewable, recyclable and reusable material
- Actively seek to reduce our energy consumption on our sites, in our offices and when we travel

- Actively seek to reduce our water consumption, improve our water efficiency and reduce our waste and polluting emissions
- Protect wildlife and conserve their natural habitats
- Promptly report any environmental incidents
- Ensure an ethical basis to all our business practices

We will never:

- Take part in or ignore any breach of environmental protection laws or regulations
- Act complacently regarding our duty towards the environment and the communities we affect
- Appoint a supply chain partner who is known to trade unethically, or who is known to use slave labour, or operate standards of safety, labour and human rights that are not in compliance with local laws and our own Code
- Procure products from illegal sources

We can also provide a copy of our Supplier Code of Conduct as required.

Pause for a second!

Would you ever...?

- ... dispose of substances or materials in a reckless or inappropriate way?
- ... be tempted to compromise on a best practice approach to maximise profit?
- ... fail to report a contractor or other third party working on our behalf for their poor environmental practices?

Respecting communities



OUR CODE

We value our reputation as a trusted partner with all our stakeholders and are aware that all our activities impact on people and their communities. We are committed to listening, acting on and learning from their concerns to build a positive legacy.

WHAT THIS MEANS

Our projects impact on people – on those who may be affected during our operations and on the communities using the lasting structures we create. We listen to people's views and concerns and we act on them wherever we can to maintain and enhance our reputation as a 'trusted partner' and considerate constructor.

We believe we can engage in profitable business within environmental limits and have a positive impact on communities. We will seek to employ suitable qualified local people whenever we can.

Making it personal:

To ensure you comply with our Code:

- Never be arrogant towards or dismiss the concerns of a member of the public
- Maximise positive and minimise impacts of our project activities on the local community by keeping to the agreed working times and routes or project location
- Where possible, engage with the local community and answer their questions

We will always:

- Comply with local laws and regulations
- Respect the cultures and different business customs of the local community (where they do not conflict with this Code)
- Take notice of the concerns of the local community and take steps to mitigate them whenever possible
- Keep the local community informed

- Seek to employ local people on our projects whenever practical
- Work with government agencies and clients to provide opportunities for sustainable employment and apprenticeships for local people

We will never:

- Adopt the attitude that 'it's not my problem'
- Ignore or dismiss the concerns of local people, action groups, communities or recognised non-governmental organisations (NGOs)
- Ignore the social impact of our projects on local people

Pause for a second!

Would you ever...?

- ... continue working outside the agreed hours even though you knew this could have a negative impact on local people?
- ... be dismissive towards a member of the public who has contacted the project and tried to raise a concern with you?
- ... promise to attend a public meeting concerning one of our projects and then just not show up?

Charitable and not-for-profit organisations



OUR CODE

We will actively support local charitable initiatives and other non-profit organisations that share our values and sustainability objectives.

WHAT THIS MEANS

Our aim is to engage with and provide the greatest legacy benefits to the communities most directly impacted by our projects, both in the construction phase and over the lifetime of the structures we create. We can do this in many ways including supporting appropriate charities and non-profit organisations that are genuine and correctly registered.

We have initiatives that encourage our employees to give their time to charitable causes during working hours.

Making it personal:

To ensure you have a positive impact:

- Get involved with our sponsored charities or others you believe in but make it clear when you are acting for Aureos and when in a private capacity

We will always:

- Ensure a charity is appropriate and get prior approval before making any financial or other contribution
- Assess any potential conflict of interest before committing to a charitable cause

We will never:

- Use charitable donations or sponsorship as incentives or rewards for obtaining or retaining business
- Make a donation or offer sponsorship without checking is suitable and appropriately administered
- Use charitable donations as a substitute for political payments

Pause for a second!

Would you ever...?

- ... become involved in a charity despite being aware of a personal conflict of interest?
- ... knowingly support a charity having read in the newspapers about it being a front for political or other hidden activities?

2

Section 2

Corporate integrity

Integrity is a Aureos standard wherever we do business

THIS MEANS EACH OF US:

- Being fair and transparent
- Valuing and respecting those who work for and with us
- Never ignoring or condoning wrongdoing

It is down to each one of us to maintain and enhance the company's integrity and reputation.

IN ESSENCE, WE WILL:

- Act with integrity, fairly and transparently
- Record all information accurately and honestly
- Follow the anti-bribery and anti-corruption laws of the UK and any other countries where we are working
- Never permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Offer or accept gifts or hospitality, if we think they might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk they could be misconstrued or misinterpreted by others

THIS SECTION COVERS:

- Laws and regulations
- Bribery and corruption
- Fraud, deception and dishonesty
- Money laundering
- Conflicts of interest
- Gifts, gratuities and hospitality



ASSOCIATED GROUP POLICIES:

- Health, safety and wellbeing
- Quality assurance
- Asbestos
- Modern slavery and human trafficking
- Tax strategy
- Anti-facilitation of tax evasion
- Anti-bribery
- Competition law compliance
- Human resources

Laws and regulations



OUR CODE

We welcome fair, open and honest competition and refuse to engage in practices that try to achieve an unfair competitive advantage. We commit to comply with the laws and regulations applicable to our business, and constantly seek to go beyond these standards.

WHAT THIS MEANS

At Aureos, safeguarding our reputation for integrity is vital to our business success, so trying to gain an unfair competitive advantage by knowingly contravening laws, or avoiding compliance with legislation for financial gain is unacceptable.

Antitrust or competition laws protect free enterprise and prohibit behaviour that limits trade or restricts fair competition. These laws apply to every level of business. They combat illegal practices like price-fixing, market sharing or bid rigging, or behaviour that (depending on the applicable law) aims to either achieve or maintain a monopoly or to abuse a position of dominance in a particular market.

These laws can be very complex, so if in doubt, ask. Contravention of such laws is usually very serious and in some cases can mean individuals facing criminal prosecution. They can also result in very large fines against the company. For example, a breach of European competition law can result in fines of up to 10% of a company's global revenue.

Making it personal:

To commit to our Code, you should:

- Conduct business in a fair, open and honest way at all times, adhering to the appropriate laws and regulations, refusing any attempts to rig prices, terms, bids, tenders or contracts, to boycott particular suppliers or to manipulate production

We will always:

- Pay the appropriate amount of tax due on business activities in the jurisdictions where we operate
- Ensure that any agreement with subcontractors, suppliers and third parties does not raise competition concerns
- Keep sensitive commercial information such as prices confidential
- Report any suspicions or allegations of possible anti-competitive behaviour
- Leave a business meeting if sensitive competition issues such as pricing arise
- Inform our legal department if we are offered or given any inappropriate confidential

information (e.g., if a person we have submitted a tender to accidentally returns a competitor's information)

- Seek legal advice if in any doubt

We will never:

- Engage in or condone bid rigging
- Make agreements (tacit or otherwise) between competitors to fix prices, bids or contracts
- Share geographic markets with competitors, or agree not to compete in particular markets or for particular customers
- Use our size or position to keep out competitors or exploit customers or third parties
- Agree to avoid certain subcontractors or suppliers
- Obtain information through illicit means

Pause for a second!

Would you ever...?

- ... have an innocent but inappropriate chat with a competitor at a trade fair that could be viewed as a willingness to engage in compromising activity?
- ... offer sensitive or confidential information about a tender to a competitor?
- ... suspect a competitor of price rigging but do nothing about it?

Bribery and corruption



OUR CODE

We will never give or receive bribes or facilitation payments or engage in any form of corruption, either directly or through our supply chain or other third-party entity.

WHAT THIS MEANS

Bribery is when someone offers, promises or gives – or seeks or accepts – a financial or other advantage with the intention of inducing or rewarding another person to act improperly.

Corruption is any form of illegal, dishonest or bad behaviour, especially by people in positions of authority.

A facilitation payment is usually a small payment (or gift) made to public officials in order to speed up or 'facilitate' actions the officials should already do as part of their routine job. We make no distinction between facilitation payments and bribes, regardless of their size or the local culture.

Bribery and corruption have absolutely no place within Aureos – and that is why we operate a strict no tolerance policy towards bribery in all its forms, whether directly or through third parties.

Making it personal:

To commit to our no tolerance policy you should:

- Follow the anti-bribery and anti-corruption laws of the UK and the country you are working in
- Familiarise yourself with our published anti-bribery and corruption policy
- Reject and report anything

We will always:

- Be honest, lawful and professional in all our business activities and dealings
- Record all activities and transactions accurately, completely and transparently
- Report any attempts to bribe us, or to solicit bribes from us, and any suspicions we have about bribery and corruption

We will never:

- Use company funds, in the form of payments or gifts and hospitality, for any unlawful, unethical or improper purpose
- Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in their course of their public responsibilities

Pause for a second!

Would you ever...?

- ... reach a private 'agreement' with an official, supplier or competitor?
- ... consider paying more than the market price for goods and services to anyone as a favour or for something in return?
- ... ignore suspicions that someone may be attempting to bribe you and instead keep quiet?

Fraud, deception and dishonesty



OUR CODE

We never knowingly participate in, condone or ignore any kind of fraud, false claim, deception or dishonest behaviour or allow someone else to do so on our behalf.

WHAT THIS MEANS

Fraud is any attempt to deliberately deceive someone, when you act dishonestly or abuse your position to gain a material advantage. The 'advantage' is often money but could also be property, a service or preferential treatment.

Fraud is a criminal offence in many countries and in countries with strict anti-fraud laws, such as the UK, you may be liable to prosecution if you are careless or reckless in letting fraud happen even if you didn't deliberately set out to defraud.

A particular fraud that can arise in our industry is the making of false claims. You would be making a false claim if you claim for something you are not entitled to or deliberately inflate a claim for time, materials or services.

Using or diverting the company's money or resources for improper purposes is also fraud.

Making it personal:

To ensure you never act fraudulently:

- Make sure your claims are accurate and can be backed up by documentary evidence
- Never try to conceal defects or fabricate evidence or ask anyone else to do so
- Only use company resources (money, time and materials) for legitimate company business
- Carefully check anything that is your responsibility

Report any mistakes or anything that does not seem right to your line manager immediately

We will always:

- Act fairly and transparently
- Make sure our books and records are complete and not misleading
- Ensure our invoices reflect the true situation and comply with our contractual obligations

We will never:

- Falsify expenses or claim for expenses not incurred on legitimate company business
- Knowingly misrepresent or inaccurately record time spent or materials or services provided
- Allow anyone else to act fraudulently on our behalf
- Ignore anything that we suspect could involve or give the appearance of fraud or deception

Pause for a second!

Would you ever...?

- ... inflate costs on an invoice to a client to compensate for their difficult behaviour?
- ... record transactions in a different time period from when they were incurred to make the figures look better?
- ... use old test or inspection results to cover up for tests not completed?
- ... use company property for your own private business without prior approval?
- ... withhold payment to a third party without proper justification?

Money laundering



OUR CODE

We will always ensure Aureos businesses are never used as vehicles to launder money, facilitate financing of illegal organisations or other activities designed to hide criminal property.

WHAT THIS MEANS

Money laundering is concealing the proceeds of criminal activity through a series of otherwise legitimate business transactions. It is closely linked to fraud as well as bribery and corruption.

Making it personal:

The following are key indicators of money laundering taking place:

- Any situation in which the counterparty will not provide details of its ownership, or where you cannot identify its ownership
- Irregularities in the way payments are being made
- Requests to make payments in cash or cash equivalent
- Requests to make payment in currencies other than those specified in the invoice or contract
- Requests to make payments involving unknown or unnecessary intermediaries unless you are clear about their role
- Where you recognise that there are overpayments

We will always:

- Assess the integrity of potential customers and partners and conduct appropriate risk-based due diligence enquiries about any third parties and any funds, goods or services that we are to receive

- Report any concerns about money laundering to the Finance Director and Commercial Director

We will never:

- Discuss any suspicions of money laundering that we may have with a counterparty unless we are authorised by the Finance Director to do so, since we could impede a proper investigation and/or commit an offence of 'tipping off' if we fail to get prior approval from the Finance Director
- Conceal or disguise monies that may be the proceeds of crime
- Accept cash payments

Pause for a second!

Would you ever...?

- ... proceed with a deal that was clearly too good to be true without first undertaking appropriate due diligence?
- ... work with an unknown individual or organisation who want to engage Aureos's services to fast track the tender process, without having done any company checks, just because they appear to be cash rich?



Conflicts of interest

OUR CODE

We always avoid or declare situations in which our personal interests could lead to a potential conflict of interest as soon as we become aware of them.

WHAT THIS MEANS

A conflict of interest arises when two or more interests compete, potentially compromising someone's judgement, loyalty or independence. Usually the conflict is about individuals benefiting at the expense of the company or another employer.

Aureos respects your privacy, believes that outside interests benefit employees, and therefore does not normally take an interest in personal conduct outside of work. However, if your personal, social, political or private business activities conflict with your loyalty and obligations to the company this 'conflict of interest' must be resolved.

Many conflicts of interest can be resolved in a mutually acceptable way, but they must be dealt with.

Failure to disclose a conflict may lead to disciplinary action. Even the hint or appearance of a conflict of interest can be just as damaging as an actual conflict of interest.

Making it personal:

To ensure you are never placed in a compromised position or find your loyalty or objectivity is questioned:

- Consider each of your outside activities as an independent person might see them
- Never accept freelance work (paid or voluntary) for a competitor in your personal time
- Consider carefully before making investments in companies with which we trade or appoint as partners or suppliers
- Never use company premises or time for your outside activities
- If you hold a position of influence within a company, ensure you inform us if a close relative holds a similar position in a competitor or a partner, supplier or subcontractor

We will always:

- Declare any conflicts of interest or perceived conflicts of interest as soon as we become aware of them
- Inform the company if a close relative holds a position of influence within a company

- Abstain from any decision making process where our motives, loyalty or independence could be questioned
- Seek approval before accepting any outside employment, advisory position or directorship

We will never:

- Use our position, contacts or any knowledge gained within Aureos for personal gain, or to benefit family or friends
- Act in a way that may create the impression that customers or suppliers have a contact within Aureos who can exert influence on their behalf
- Pay a third party more than a contractually agreed, market-based fee for goods or services
- Accept gifts or hospitality that could impair our judgement or independence, or be open to misinterpretation
- Invest in supplier, customer or competing companies if the investment might influence decisions we make on behalf of the company

Pause for a second!

Would you ever...?

- ... develop a particularly close personal relationship with a key supplier or contractor?
- ... get involved in hiring, managing, appraising a relative or friend?
- ... make a decision to benefit yourself, or a relative or friend, rather than the company?
- ... accept a donation or sponsorship, on behalf of an organisation you are involved in, from a supplier?

Gifts, gratuities and hospitality



OUR CODE

We make sure all gifts, gratuities and hospitality are within acceptable limits and will never offer or accept anything that could be perceived as an attempt to create a sense of obligation or otherwise inappropriately influence a business decision.

WHAT THIS MEANS

The exchange of gifts, gratuities and hospitality is customary in some cultures and can build goodwill in business relationships, but some gifts and entertainment can be used improperly to influence (or appear improperly to influence) a business decision. Some can even be seen as bribes.

Gifts and entertainment often fall into three categories: those that are usually acceptable and that you may approve yourself, those that are never acceptable and those that may be acceptable but require prior approval. Aureos has a gifts and hospitality policy, which sets limits for and gives examples of each category.

With any gift, gratuity or hospitality, it is not just the value that is important; the intent and timing too must be considered. Is it to build a business relationship or offer normal courtesy, or is it to influence the recipient in a prospective business decision? Any gifts or hospitality we receive (or offer) in the course of business must be legal, customary and reasonable in terms of value and frequency.

Excessive or inappropriate gifts or hospitality can tarnish our reputation for fair dealing and may even be against the law.

Making it personal:

To ensure you are never compromised or embarrassed by giving or receiving gifts or hospitality:

- Make sure you know the specific rules that apply to your specific part of the business
- Check that anything you intend to offer complies with the rules of your recipient's employer
- Ensure you are transparent about anything you receive and enter it in the gifts register
- Explain our policy and decline any offer which may place you under an obligation to the donor
- Seek advice from your line manager if you receive a gift or offer of hospitality, which may be unacceptable under our policy

We will always:

- Comply with the limits in our policy and record gifts and hospitality given and received in the appropriate register
- Exercise care when offering any gift or hospitality to a public official and check the specific rules for the country in advance

We will never:

- Offer or accept gifts or hospitality, if we think they might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk they could be misconstrued or misinterpreted by others
- Accept any gift or hospitality which is offered for something in return ('quid pro quo')
- Accept any gifts of cash or cash equivalents (vouchers, investment securities, cheques and so on)
- Offer or accept any hospitality of an inappropriate nature or which does not comply with our commitment to respecting the individual or which might damage our reputation

Pause for a second!

Would you ever...?

- ... apply a double standard by accepting something you know you would not be able to offer (or vice versa)?
- ... feel under an obligation to a supplier, contractor or other third party after accepting a gift or hospitality from them?
- ... let the value or cachet of a gift or hospitality override your judgement and good sense?
- ... accept a gift or hospitality even though you have struggled to justify it to yourself?
- ... send a gift even knowing it was unacceptable under the recipient's rules?

3

Section 3 Working relationships

We are committed to creating an environment where everyone is treated with honesty and respect. We all have a unique blend of experience, talents and perspectives and this diversity is one of our key business strengths.

We treat all our stakeholders – employees, customers, suppliers, key business influencers and the communities in which we work – with the same respect and professionalism we expect from each other and strive to build strong and enduring relationships that add value.

Our customers are critical to the success of our business and conducting ourselves ethically and responsibly will enhance our relationships and our reputation. We believe our customers should be able to expect the same standards from us as we expect from our colleagues and others.

IN ESSENCE, WE WILL:

- Be a business in which everyone can reach their potential, promoting a culture of equality, diversity and inclusion throughout the company
- Reward and promote our employees on the basis of skills, performance and merit
- Protect our workers from all forms of harassment and remove barriers to equal opportunity
- Build enduring customer relationships that create value
- Treat all suppliers and third parties with respect and dignity
- Promote and protect human rights wherever we operate



ASSOCIATED GROUP POLICIES:

- Equal opportunities
- Drugs and alcohol
- Training and development
- Human resources
- Modern slavery and human trafficking
- Hours of work
- Work safe
- Road traffic safety
- Responsible procurement
- Anti-bribery

THIS SECTION COVERS:

- Equality, diversity and inclusion
- Harassment and bullying
- Human rights and modern slavery
- Drugs and alcohol
- Relationships with employees
- Relationships with customers
- Relationships with suppliers and third parties
- Relationships with government and industry bodies



Equality, diversity and inclusion

OUR CODE

We are committed to ensuring that we employ and promote people solely based on personal merit and contribution. We actively seek to eliminate discrimination in all its forms among our workforce, and treat everyone with fairness and respect.

WHAT THIS MEANS

Providing equality means providing equal opportunity for everyone by ensuring that they receive the same high standards of treatment and respect regardless of gender, race, age, mental or physical ability, sexual orientation or any other social category that exists.

For us, respecting diversity and inclusion means seeking to employ a workforce that reflects the diversity of the population of the country, valuing the varied talents and perspectives of our workforce and understanding the need to reflect the diversity of clients and communities we serve.

We firmly believe the company is stronger for employing and working with people with wide ranging talents and experiences, and that with us, all employees can reach their potential.

Making it personal:

To ensure you understand and live up to this Code:

- Provide equal opportunity and respect for all
- Comply with all employment laws in respect of equality, diversity and inclusion, and comply with the Equality Act 2010
- Familiarise yourself with the supporting policies
- Treat all colleagues and third parties with fairness, respect and dignity
- Never belittle or dismiss another's background, experience or perspective because it differs from your own

We will always:

- See to create a supportive and sympathetic environment in which people from all backgrounds can reach their full potential
- Strive to identify and remove barriers that hinder the achievement of a diverse and talented workforce

- Ensure all employees are aware of our Code and policies and the role and responsibilities they have in upholding them
- Ensure those involved in recruitment, selection, training, grievance, discipline or dismissal are familiar with our Code and the policies that support it
- Recruit, select, promote, train and reward on the basis of skills, merit and potential
- Ensure appropriate opportunities for learning and development are made available to all employees
- Accommodate cultural or religious practices wherever possible
- Regularly monitor our progress and policies and amend as necessary in line with legislation and our vision

We will never:

- Accept any form of unlawful discrimination

Pause for a second!

Would you ever...?

- ... make fun of or belittle someone because their background, skills, or ability differs from your own?
- ... promote or reward someone on grounds of favouritism rather than merit?
- ... allow someone to treat you unfairly or not give you an opportunity that you truly deserve?

Harassment and bullying



OUR CODE

We are committed to providing an environment free from harassment and bullying where all employees are treated, and treat others, with dignity and respect.

WHAT THIS MEANS

Harassment is any form of unwanted physical, verbal or non-verbal abuse that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them.

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Bullying can take the form of physical, verbal and non-verbal conduct.

Harassment and bullying can occur at work and out of the workplace, such as on business trips or at work-related events or social functions. Our policy covers harassment and bullying by employees and third parties, such as customers, suppliers, and other significant stakeholders who interact with our business.

Making it personal:

To ensure your behaviour is never regarded as harassing or bullying:

- Treat all colleagues and third parties with respect and dignity
- Be aware that actions, deemed acceptable in one culture, may not be acceptable in another
- Never make inappropriate jokes, or try to humiliate a colleague, or spread gossip or rumours about them
- Never threaten a colleague with physical or verbal violence
- Never make a false or malicious complaint

We will always:

- Protect workers from all forms of harassment and enable them to take action against it without fear of reprisal
- Encourage employees who feel they are being harassed or bullied to speak up

- Take complaints or harassment and bullying seriously and investigate immediately
- Take appropriate disciplinary action against anyone found to violate this Code and its supporting policies

We will never:

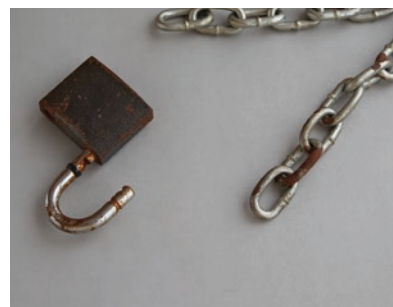
- Accept any kind of behaviour that could be interpreted as harassment or bullying
- Threaten a colleague, supplier, customer or other third party with physical violence
- Engage in or accept harassment of a sexual nature
- Allow retaliation or victimisation of an employee who raises a complaint in good faith or who participates in an investigation
- Tolerate false or malicious complaints

Pause for a second!

Would you ever...?

- ... share or pass on inappropriate jokes or images?
- ... deliberately isolate a colleague or arrange for others to do so?
- ... repeatedly and unfairly pick faults with someone?
- ... spread spiteful, hurtful or other disruptive rumours or gossip about someone?

Human rights and modern slavery



OUR CODE

We are committed to protecting the human rights of all those who work for us and with us to ensure that they are able to work freely and receive fair reward for their contribution.

WHAT THIS MEANS

The basic human rights of an individual, as defined by the United Nations Universal Declaration of Human Rights, include the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, modern slavery, servitude, torture, or inhumane or degrading treatment; and freedom of speech, thought, conscience and religion.

We are committed to upholding the human rights of those we employ and work with and complying with the conventions and standards regarding enforced or child labour set by the International Labour Organisation.

Making it personal:

To ensure you act within our Code:

- Always comply with applicable laws, standards and regulations when employing people
- Listen to and respect those who suggest a new, better or alternative way of working
- Speak up if you are concerned that someone we employ or a third party we work with is breaking our Code

We will always:

- Create safe working environments for everyone
- Follow the labour laws of the jurisdictions in which we operate
- Comply with minimum wage and minimum age requirements
- Adhere to regulations regarding maximum working hours
- Listen when legitimate concerns are raised, and whenever possible take action to address them

- Encourage employees to become involved in improving team performance
- Report any actual or suspected illegal activity to the appropriate authorities

We will never:

- Exploit anyone
- Allow anyone to be exploited in our name
- Tolerate the use of forced or trafficked labour
- Do business with any individual, or organisation that does not support basic human rights
- Influence an employee's decision to join or not to join a trade union

Pause for a second!

Would you ever...?

- ... do nothing even though you have serious concerns about the labour practices of a supplier, contractor or other third party?
- ... fail to perform due diligence on a supplier, third party or contractor in a territory where you know labour standards can fall short of our own?
- ... treat anyone in a way that might be regarded as exploitative?

Drugs and alcohol



OUR CODE

We have a zero-tolerance approach to any Aureos person, either working directly for us or with us, or any other stakeholder connected with our business activities, who turns up for work at any of our premises or project sites under the influence of drugs or alcohol. It directly undermines our incident and injury free aspirations.

WHAT THIS MEANS

Being 'under the influence of' drugs means testing positive for the presence of any legal or illegal substances without prior legitimate and verified explanation and consent for doing so, and which could seriously compromise the safety and lives of others while undertaking their work duties.

At Aureos, being 'under the influence' of alcohol means testing positive to the presence of alcohol above the agreed UK legal limit for driving, or the agreed internal company limit for safe working (which may be lower than 35 micrograms of alcohol per 100 millilitres of breath). Aureos people must be aware of the specific tolerances (alcohol limits) as they apply to their area of work and remain within these limits whenever they come to work.

We operate a random, 'unannounced' and 'for cause' testing procedure for drugs and alcohol to ensure these standards are constantly upheld.

We will always:

- Present ourselves at work in a fit condition to perform our job, free from the influence of alcohol or illegal drugs
- Take a positive approach to any employee/worker seeking guidance in overcoming alcohol and/or drug related problems
- Notify our line manager of the possible impact on health and safety or fitness to work of any medication prescribed to us
- Investigate any instances of drug or alcohol use in breach of 'The Code' and take suitable action (up to and including dismissal or termination of contract)

We will never:

- Ignore the signs of or tolerate the use of drugs or alcohol by any members of our teams during working hours
- Condone, recommend or encourage the consumption of alcohol to externally-recognised 'excessive' limits

Pause for a second!

Would you ever...?

- ... ignore a colleague or co-worker smelling of alcohol, slurring speech or appearing unsteady on their feet?
- ... turn a blind eye to a colleague or co-worker telling you they may have a drink or drugs problem and are clearly seeking help and support?

Relationships with employees

OUR CODE

We will respect human dignity and strive to provide an environment that encourages employees to realise their full potential and thrive. We will respect each employee's personality and motivation and, in appropriate circumstances, try to offer matching opportunities in other parts of the business. By building such mutually benefiting relations between each other, we will fulfil our business obligation with our employees.

We recognise and respect that people will have and form personal relationships with their colleagues. We see these as a positive and valuable part of our culture. However, we will always ensure that progression is based solely on objective merit and that a personal relationship does not create a conflict of interest that compromises an individual's or Aureos' reputation for integrity.



WHAT THIS MEANS

- Remaining faithful to the principle, "our greatest asset is our people", Aureos is committed to building employability through the development of people with outstanding skills and capabilities, creativity and a challenging 'can do' spirit. These development opportunities are enabled through fit-for-purpose personnel systems, employee education, training, development, performance management and reward structures
- Aureos does not concern itself with the private lives of its employees unless they adversely impact its effective operation or its reputation. Employees who are relatives or who have a close personal relationship should not normally have a supervisory, assessing or authorising relationship with each other. Employees must inform their line manager if they have a close personal relationship with another employee, customer or supplier which could be considered by colleagues or other, as impacting on the way they conduct themselves at work

Making it personal:

To ensure you act within our Code:

- Always strive to act as a respectable member of society, as well as a good corporate citizen of the Company, utilising common sense, integrity and respect for others
- Line managers at every level will fulfil their tasks based on the recognition that people development is their most important responsibility
- Always inform your line manager if you have or develop a close personal relationship with a colleague
- Never make a decision regarding pay, progression or performance for someone with whom you have a close personal relationship

We will always:

- Promote a culture of diversity, respect, and equal opportunity, where individual success depends only on personal ability and contribution to the company
- Make decisions about recruitment, hiring, reward, development, and promotion based only on ability, experience, behaviour toward others, work performance, and demonstrated potential in relation to the job
- Develop employee talent and support everyone in achieving their full potential

- Depend on open and honest conversation to keep our fast-paced business aligned with our values and to ensure we address and learn from our mistakes
- Accept accountability for identifying and reporting any conduct suspected to be inconsistent with our values or policies so that our company may continue to serve customers
- Report concerns in good faith, and never tolerate retaliation

We will never:

- Renege on any of the above principles or commitments
- Turn a blind eye to inappropriate behaviour between employees that could place their colleagues in compromising situations, damage the integrity of our business and/or erode our reputation

Pause for a second!

Would you ever...?

- ... ignore career favouritism being given to a colleague by your line manager, purely on the basis of a known personal relationship?
- ... consider hiring a close friend or relative into a role, knowing you had interviewed more capable/suitable candidates?

Relationships with customers



OUR CODE

We treat customers with the same levels of integrity and professionalism we expect from our colleagues and others, and strive to build strong and enduring relationships that add mutual value.

WHAT THIS MEANS

Our customers are critical to the long-term future of our business and living up to our values and the principles of fairness, transparency and professionalism will enhance our relationships and our reputation with them. We believe our customers should be able to expect the same standards from us as we expect from our colleagues and others.

We will always:

- Seek to add additional value for our customers wherever possible and always deliver on our promises
- Only work with customers who share our business and ethical standards in accordance with this Code of Conduct
- Act fairly, transparently and ethically when appointing suppliers and partners on behalf of our customers
- Meet or exceed our contractual obligations and work together to resolve any disputes early on
- Communicate honestly and transparently at all times
- Seek to develop strong and enduring relationships

We will never:

- Forget that satisfying our customers is critical to the success of our business
- Fail to keep our own contractual agreements
- Undermine our customers with anyone else in the industry to gain commercial or any other advantage

Pause for a second!

Would you ever...?

- ... deliberately misrepresent or falsify facts to a customer in order to gain an advantage in a bid process?
- ... make disparaging or critical comments about competitors to customers?

Relationships with suppliers and other third parties



OUR CODE

We are committed to developing mutually beneficial relationships with suppliers and key third parties who share our values, and respect and uphold our Code of Conduct.

WHAT THIS MEANS

Suppliers and third party organisations play a key role in enabling Aureos to deliver its core business services for our customers. We believe in operating in an openly, fair and ethical manner to build lasting relationships and deliver the highest value for all our stakeholders.

We will always:

- Select suppliers and partners based on fair, transparent and objective processes
- Work with suppliers who share our business and ethical standards in accordance with this Code of Conduct
- Ensure total compliance with the applicable laws and regulations of the country in which we are operating, including working hours, wages, welfare, human rights and labour laws
- Encourage suppliers to provide robust training programmes and support for employees' career development
- Ensure work is completed to the agreed timelines, quality, cost targets and with the highest standards of professionalism
- Work openly and collaboratively with our supply chain, resolving disputes in a non-adversarial manner

We will never:

- Tolerate any form of bribery or corruption
- Ignore any practices of human rights infringements committed by our suppliers

Pause for a second!

Would you ever...?

- ... turn a blind eye to a subcontractor taking dangerous short-cuts on a project in order to save time or money?
- ... accept excessive gifts or hospitality during a competitive tender process to influence a decision in a supplier's favour?

4

Section 4 Company assets and information

As a large, information-driven organisation, we are entrusted with personal information and confidential company data. We have a duty to keep it safe and secure, while abiding by the General Data Protection Regulation and Data Protection Act 2018 covering the collection, storage, sharing, updating and deletion of all personal information. This section sets out our responsibilities in this regard.

IN ESSENCE, WE WILL:

- Respect and safeguard confidential and personal information
- Use computer systems and communication devices appropriately
- Be transparent in our communications and our dealings with key opinion formers
- Record all financial transactions completely, accurately and honestly
- Disclose any breaches of 'The Code' to impacted parties as soon as they become known



ASSOCIATED GROUP POLICIES:

- Information security
- Information technology and communications
- Use of mobile phones and electronic devices
- Road traffic safety

THIS SECTION COVERS:

- Handling confidential information
- Protecting company assets and intellectual property
- Protecting personal data
- Using company IT and communications systems
- External communication



Handling confidential information

OUR CODE

We keep confidential information safe and protect it from unauthorised disclosure. This protection extends to all confidential information belonging to customers or to other third parties.

WHAT THIS MEANS

Confidential information is any information explicitly categorised as highly restricted, developed by, or entrusted to any Aureos employee. This could include financial information, delivery know-how, business or tendering strategies, bid documents, and customer, supplier, or employee information. It may be oral, visual, in writing, or in any other form.

Making it personal:

- Always apply the same standards of confidentiality to information entrusted to you as you do if it were your own personal information
- Adhere to our information security policies when storing or exchanging confidential information

We will always:

- Keep all confidential information safe and only share it internally on a 'need to know' basis
- Only disclose confidential information to a third party on a confidential basis and with appropriate authorisation to do so
- Apply appropriate levels of security, such as passwords or other encryptions, when sharing confidential information with third parties
- Report any confidential information received in error to our In House Legal Advisor and immediately return it to its rightful owner

- Ask for advice if we think that confidential information may have been compromised
- Ensure that our customers, suppliers and other third parties protect our confidential information by requiring them to sign the Aureos standard Non-Disclosure Agreement form

We will never:

- Leave confidential information unsecured, or otherwise fail to take care of it
- Discuss confidential information in a way that may be overheard in public
- Elicit or seek to discover confidential information from another

Pause for a second!

Would you ever...?

- ... arrange a meeting or answer a call in a public place without considering confidentiality issues?
- ... look at confidential documents not marked for your attention?
- ... share confidential information electronically without taking steps to safeguard it?

Protecting company assets and intellectual property



OUR CODE

We value all our assets and resources – tangible and non-tangible – and will protect them from improper use.

WHAT THIS MEANS

Aureos has a wide variety of assets, many of which are of great value to the Group, and all employees have a responsibility for ensuring that they are protected at all times.

These assets include physical assets such as property, personal equipment and company funds, as well as 'intellectual property' such as patents, trademarks, copyright and various kinds of confidential business information such as business plans, research and technical data, sales or other corporate databases and information used in our business activities such as pricing and tendering strategies. Even time at work is a company asset and must not be abused.

Aureos is committed to investing in its employees, developing talent and making this a great place to work. In return, we ask you to treat the company's assets with due care and respect.

Making it personal:

- Accept personal responsibility for using Group assets appropriately and protecting them against loss, theft or damage
- Acknowledge and use the trademarks and other intellectual property of Aureos properly
- Respect intellectual property rights, including those of third parties
- Remain alert to and report any situations or incidents which could lead to the loss, misuse or theft of company property

We will always:

- Take great care when spending money on the company's behalf
- Treat company property with respect and use assets and resources appropriately
- Avoid excessive waste and look for more efficient ways of allocating resources
- Manage intellectual property, including rights, patents and know-how, effectively
- Follow all applicable policies and procedures

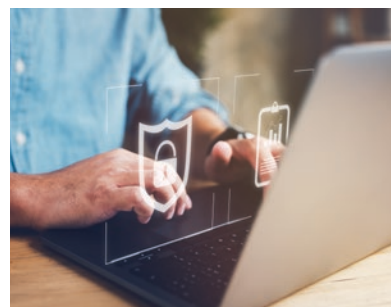
We will never:

- Condone theft, misuse or misappropriation of company assets or property
- Use the company's property for inappropriate personal use
- Knowingly infringe third party intellectual property rights

Pause for a second!

Would you ever...?

- ... use company stationery for personal use?
- ... claim back money on expenses that you didn't actually spend on business?
- ... 'borrow' company property with a view to giving it back later?
- ... discuss confidential business developments with people outside the company?



Protecting personal data

OUR CODE

We respect everyone's right to privacy and treat all personal information as confidential. We will comply with General Data Protection Regulation and Data Protection Act 2018 and associated privacy laws at all times.

WHAT THIS MEANS

Data Protection laws safeguard information or personal data about individuals, including their name and contact details, employment and financial information, age and nationality. Information on race or ethnic origin, religion or philosophical beliefs, health or sexual orientation, criminal behaviour or trade union membership is sensitive personal data and subject to stricter controls.

Aureos respects the basic right of individuals – including employees, customers and suppliers – to privacy. Individuals trust us with their data; if we fail to look after their data, we risk destroying that trust.

Making it personal:

To commit to our Data Protection Code, you should:

- Accept personal responsibility for keeping personal data secure; this includes hard copy files and the ever increasing range of digital formats available – including but not restricted to laptops, digital devices and web-based and cloud-based platforms
- Make sure you understand what is permissible and what is not

Refer to Aureos's in-house legal advisor for advice rather than take a risk.

We will always:

- Respect and safeguard personal and sensitive personal data
- Collect only the data we need, informing individuals why we need it and using it for that purpose
- Store personal data securely, making use of encryption and passwords

- Lock computer screens when leaving our desk
- Dispose of personal data in a timely and secure manner
- Report data breaches promptly (if appropriate to do so)

We will never:

- Share personal data inappropriately or without permission
- Keep personal data for longer than we need it
- Leave confidential documents, memory sticks or phones lying unattended
- Transfer personal data to other parts of the business or to a third party without first checking with the Group legal advisor

Pause for a second!

Would you ever...?

- ... arrange a meeting or answer a call in a public place without considering confidentiality issues?
- ... look at confidential documents not marked for your attention?
- ... share confidential information electronically without taking steps to safeguard it?

Using company IT and communications systems



OUR CODE

We only use the company's IT and communications systems for the tasks they are issued for, and do so in an ethical and responsible manner.

WHAT THIS MEANS

All employees with access to Aureos's IT systems and to personal computers, mobile devices or smart phones must use them **appropriately, ethically and responsibly**, making sure that no security threats are introduced and ensuring systems are kept secure.

Aureos allows a certain amount of personal use of company facilities. Individuals are expected not to abuse this through overuse or inappropriate activity.

Making it personal:

To commit to our Code, you should:

- Make sure you keep all personal IT and communication devices secure
- Follow company information, IT security and acceptable use procedures
- Keep personal and business communications separate

We will always:

- Update passwords regularly
- Password protect smart phones and other IT/communication equipment
- Include the company email signature in business-related emails
- Report any loss or security breaches promptly

We will never:

- Abuse the IT privileges given to us by Aureos
- Store personal data on the company network
- Download software or connect hardware to a company laptop without authorisation
- Use company email to distribute content that might cause offence or anxiety to colleagues
- Use company hardware for unlawful or immoral activities, or to run a personal business
- Use personal social networking accounts to communicate about company activities or business

Pause for a second!

Would you ever...?

- ... give a colleague your login details because you need them to send you a copy of a file you need to work on away from the office?
- ... use the same password over and over?
- ... download illegal copies of software to your company laptop?
- ... allow a visitor to use your PC while connected to the company network?
- ... use an internet file sharing site to store or share company documents?
- ... browse the internet from a company laptop to view inappropriate content?

Communicating externally

OUR CODE

We shall communicate or disclose information about the company in a timely, accurate and honest way and only with express permission.

WHAT THIS MEANS

We pay careful attention to how we communicate – releasing corporate and financial information in a timely manner, honestly and without misrepresentation. Even when the information might be considered as unfavourable towards Aureos Infrastructure Services Limited, we communicate with integrity.

The way we communicate and the way we talk about ourselves impacts on how people see us and how much they trust us.

Making it personal:

Unless you are part of our specialist communications team or an authorised spokesperson for the company, you should not speak on behalf of Aureos. To comply fully with our Code:

- Take care not to broadcast (e.g. by email/social networking sites) internal communications externally without the necessary prior approval
- Gain approval for, monitor and limit what you say at conferences and public meetings
- Use email, and other electronic communication methods, with the same care as you would a written communication
- Watch out for situations in which anything you say may be interpreted as being the company's view

Always make it clear when you are speaking on behalf of the company, and when your views are your own.

We will always:

- Ensure our communications are honest, accurate and not misleading
- Refer any enquires from the media to the Group Communications Director or their elected deputy
- Obtain prior approval before releasing information into the public domain

We will never:

- Express personal views in a way which might be interpreted as the company's views
- Respond to the media, regulators, government officials or any other external channel without prior permission
- Write or say anything which might embarrass our customers or damage our relationship with them
- Forget that electronic communications are legally admissible in court

Pause for a second!

Would you ever...?

- ... act as an unofficial spokesperson for the company?
- ... publicly say something disparaging about a client or competitor?
- ... send an internal email to someone outside the company?



And remember...

Your **ESSENTIAL** checklist

Is it legal?

We don't expect you to become an expert but we do expect you to check and comply

Is it consistent with our values and requirements?

Think before you act and ask yourself if this is what the company stands for

Is it right?

Ask yourself if you are comfortable with it, are you setting a positive example

How would it look to others?

Ask yourself if you'd be happy with it being published to our customers, in newspapers, and to the people in the communities where we work

Your **ESSENTIAL** rules

Know the legal and company requirements that apply to your job

Follow these standards – always

There are many ways to get help – the important thing is to use one of them (see page 10-11)

Ask if you are ever unsure what the right thing to do is

Keep asking until you get an answer with which you are comfortable

For further information on Aureos' corporate governance framework, policies, employee handbook and Business Management System, please visit the Aureos intranet.
This document is reviewed and updated on an annual basis.







AUREOS

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