Our Code of Ethics

It's how we do things
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Introduction

Thank you for taking the time to read this document.

It is really important that every single Amey employee not only reads this document but signs up to, and adheres to its content.

Like many businesses we are the sum of our people and how each and every one of us acts reflects on us as an organisation and on what we value. This document sets out what you can expect from Amey and what Amey expects from you as employees and colleagues.

This Code of Ethics sits alongside the Amey values and pulls information from a number of existing policies. These policies all remain valid and in force, however, we wanted to bring everything together to bring absolute clarity to how we want and expect us all to act.

We have outlined a number of key areas of focus. Understandably, we cannot cover every eventuality in this document. Therefore, it is important that you understand the spirit of the Code of Ethics and apply it to your everyday working life. We will not tolerate people acting in a way that does not uphold the highest standards of conduct and ethics. Anyone who fails to do so will have the appropriate sanctions brought against them. This is the Amey way of doing things and will help propel us forward and be the organisation that clients want to do business with, that communities want working for them and that people want to work for.

Andy Milner, Chief Executive, and the Executive Team

Overview

In this booklet you will find more information on:

• What does this mean in everyday working life?
• Who does our Code of Ethics apply to, and what does it mean?
• Our values – what do they mean?

What does this mean in everyday working life?

Amey places a great deal of importance on the conduct and integrity of its employees and the decisions they take. One misjudged decision can affect a contract, the company as a whole and even our parent company, Ferrovial and can impede our ability to win new contracts and work.

Bad decisions can also cost money in the form of fines and affect our reputation, but more importantly they can cost lives or lead to significant injury.

Every employee has a duty to help other employees to understand and live by this Code of Ethics, and where necessary to report any unlawful or unethical behaviour as soon as it occurs.

Compliance with this Code of Ethics is mandatory and non-compliance will not be tolerated.

Who does our Code of Ethics apply to, and what does it means in practice?

Our Code of Ethics applies to every single Amey employee, no matter what your level or how many hours you work. It applies to our temporary staff and people engaged by subsidiaries.

It relates to the way you conduct yourself with clients, colleagues, suppliers and in the communities we work in. We are also committing to work with third parties who uphold the same level of ethics as we do, including joint venture partners, sub-contractors and suppliers.

It is not possible in this Code of Ethics to cover all situations where legal or ethical issues may arise. You are responsible for understanding Amey’s standards and for asking questions when you are unclear about the meaning of the Code of Ethics or uncertain about how to handle a situation.
Our goal and our values

We’ve been in the business of creating better places for people to live, work and travel for nearly 100 years. It’s our goal and our passion – and what drives us to keep improving our services every day.

Three values underpin both our goal and the way we work. They provide a framework for delivering services and guide us every day, in everything we do.

Our Code of Ethics builds on these, illustrating and clarifying our commitment to lawful and ethical conduct in our activities and decision making. It provides examples of both how Amey acts as a company and what is expected from each and every employee to ensure the highest ethical standards are met.

Putting people first
Looking out for each other in our relentless pursuit of zero harm, involving and empowering everyone to deliver and grow, being both accountable and supportive.

Delivering great service
Showing our passion for great customer service, delivering brilliantly on what we promise, listening and responding quickly to solve problems together to get things done.

Creating better solutions
Doing things better every day, innovating and finding new ways to improve and make things simpler, collaborating, sharing our knowledge and learning from best practice.
How we work at Amey

We put the health and safety of our workers, our clients and their staff and members of the public as our first priority

At the heart of our approach to health and safety is the belief that all harm is avoidable and there is no such thing as an inevitable injury. One of our six corporate objectives is ‘Keeping people safe, every day’.

Amey expects its employees to attend for work in a fit and appropriate state with no impairment from the misuse of alcohol, drugs or similar substances.

We do not permit or condone any act of fraud, bribery, corruption or deception

Compliance with the law is the minimum required standard of conduct in Amey. It is essential for Amey to conduct its business in full compliance with the law and to ensure that its dealings with all concerned are conducted professionally, fairly and with integrity in an open, honest and corruption free environment.

We do not accept, offer or provide gifts or hospitality that do not follow the Amey policy. Amey does not prohibit normal and appropriate hospitality (given and received) to or from third parties if the following criteria are met:

- it is not made or accepted with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with the law and is appropriate in the circumstances;
- it is given or received in the name of and on behalf of Amey;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers) and is given or received openly, not secretly;
- taking into account the reason for the gift or hospitality, it is of an appropriate type and value and given or received at an appropriate time.

Amey will – always comply with applicable laws and regulations and promote ethical working practices.

I will – always ensure I am acting in line with Amey and client policies, including those relating to gifts and hospitality, and contractual requirements.

I will NOT – conduct, permit or condone any acts of fraud, bribery or corruption or deception.

Refer to the Gifts and Hospitality, Anti-Corruption and Business Ethics Policies for further guidance.

We avoid situations in which personal interests or actions could conflict or appear to conflict with the company’s best interests

Conflicts of interest generally arise when we participate in or promote activity in which we have a personal interest or that personally benefit ourselves or our families or friends, or which might interfere with our objective to carry out our responsibilities to our clients and others. These may include:

- Competing against Amey in any activity.
- Having a business or personal interest in a competitor or supplier.
- Other external activities that place you in an actual or apparent appearance of a conflict with yours or Amey’s obligations or responsibilities.

It is important that you avoid activities that may interfere with any activity or decision making at Amey.

Amey will – undertake rigorous auditing and implement systems to ensure we are providing best value to our clients and only undertaking work that is right and proper.

I will – avoid situations in which my personal interests or actions could conflict, or appear to conflict with the company’s best interests.

I will – disclose any conflicts of interest that I become aware of and will manage them appropriately and transparently.

I will NOT - undertake activity that benefits me or my team personally in a way that is not sanctioned by the business or to engage in any activity that places me in a conflict of interest with Amey or its clients or suppliers.

Refer to the Health and Safety and Alcohol and Drugs Policies for further guidance.
How we work at Amey

Amey assets, intellectual property and systems are for use at work

Amey assets are critical to day-to-day operations and should be used for Amey’s operational requirements only. These include physical assets such as laptops, phones, software and systems, and intangible assets such as time and intellectual property. However Amey does permit reasonable and appropriate personal use of physical assets for non-work related purposes such as the occasional phone call or email from the workplace. You are responsible for ensuring the safe and appropriate use and care of Amey assets.

**Amey will** - ensure that it holds legitimate rights to employ and exploit the full potential of the technologies and related assets on which the business will depend in the future.

**Amey will** – provide all employees with the correct tools needed to do their job safely.

**I will** – use Amey assets, intellectual property and systems for business use only and not for my own personal benefit.

**I will NOT** - take unnecessary risks with Amey assets and will keep them safe and secure.


We protect information and do not use it for our individual benefit

At Amey we hold a wealth of important and at times confidential information on behalf of our clients, contracts and fellow employees. It is important that this information is only used for the purpose for which it is held or given and is stored correctly and securely. This can range from ensuring our personal electronic systems such as laptops or mobile phones are kept securely (e.g. not left in a car overnight) through to ensuring any information you have access to as part of your role is secured and not misused.

**Amey will** – maintain and implement systems that keep personal data and client’s information secure.

**I will** – protect confidential and personal information and keep it secure.

**I will NOT** - take unnecessary risks or use information for purposes other than as intended.

Refer to the Information Security Policy for further guidance.
We promote diversity, inclusion and human rights and do not tolerate any kind of harassment, bullying or discrimination.

Amey is committed to achieving an inclusive working environment which values diversity. It is our policy to treat all employees, job applicants and other people we come into contact with, fairly and equally and this means treating everyone as individuals regardless of their age, gender, disabilities, marital status, race, colour, nationality, ethnic or national origins, responsibility for dependants, religion, belief, trade union activity, transsexual or sexual orientation. Our aim is to remove any barriers for employees in order for them to realise their full potential.

**Amey will** – ensure that all current and prospective employees are treated equally, fairly and without discrimination and that harassment and bullying of any employee is dealt with promptly and systematically according to agreed procedures.

**I will** – promote diversity, inclusion and human rights.

**I will NOT** – harass, bully or discriminate against anyone due to their race, sex or disability or any other individual characteristics.

**I will NOT** – condone any form of slavery or human trafficking involving either our workers or within the supply chain.

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Amey will – make us the type of organisation we are. Our customers, suppliers, communities and competitors help us to shape our strategy, strengthen our competitive advantage and enable us to grow.

Without them we are not a functioning business. It is essential that we treat all stakeholders with respect and professionalism, whilst fully complying with our legal and ethical obligations.

**Amey will** – continually review and improve our approach to engaging with stakeholders, treating them with respect and professionalism.

**I will** – develop constructive relationships with all stakeholders, treating them with respect and professionalism.

**I will NOT** – communicate or engage with Amey stakeholders in a manner that is derogatory or unlawful or which might damage Amey’s reputation.

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We treat all our stakeholders and their staff with integrity and respect.

How we treat others makes us the type of organisation we are. Our customers, suppliers, communities and competitors help us to shape our strategy, strengthen our competitive advantage and enable us to grow.

We support the communities in and for which we work and we protect and enhance the natural environment.

Delivering vital public and regulated services across almost every area of the UK means we have a huge impact on the communities we serve and environments we work in. We therefore, invest in our communities and work pro-actively to develop skills and employability with the long term unemployed, young people and armed service leavers.

We support local and small businesses and engage with a number of charities and community projects through allowing our employees one paid day a year to support an initiative of their choice.

Amey is committed to protecting and enhancing the environment in which it works. Working with our clients, partners and supply chain we undertake environmental risk assessment to prevent pollution and minimise and mitigate our environmental impact.

We believe in sustainable growth and actively pursue continual improvement in order to use materials, products, processes and deliver services that respect the fact we operate in a world with limited natural resources, biodiversity scarcity and climate change.

**Amey will** – take appropriate action to protect and conserve the natural environment.

**Amey will** – provide all employees a paid volunteer day per year to use in their local community.

**I will** – respect the communities in which I work and protect and enhance the natural environment.

**I will NOT** – knowingly disrespect the people or communities we serve.

Refer to the Community and Charity, Environmental and Corporate Sustainability Policies for further guidance.
We ensure the accuracy of Amey business and financial records and reporting and communicate information honestly

As part of our day to day work we are required to keep track of the work that we or our suppliers carry out, and of money spent and received across our contracts. It is important that this is done accurately, properly and consistently.

This includes not only financial records, but record keeping completed by employees, including but not limited to quality reports, time records, expense reports, claim forms and resumes.

Amey will – set a standard for all employees and contracts to report and adhere to.
I will – ensure accuracy in financial and performance reporting and communicate information honestly.
I will NOT – guess or make assumptions or sign off on any work or requisition without having checked the correctness and completeness of the documents and works and having actively applied my mind to the matter and ensured that company money is used properly and in line with our policies.

Refer to the Revenue Accounting Policy for further guidance.

We do not make monetary or other donations to any political parties or candidates

Amey is politically neutral and aims to serve the communities we work in regardless of the political party or leadership. We believe in providing services to communities irrespective of political affiliation.

Amey will – not make monetary or other donations to any political parties or candidates.
I will – do my work to the best of my ability regardless of my political views.
I will NOT – make monetary or other donations to any political parties or candidates on behalf of Amey.

We only engage in fair and lawful competition

We compete for business through the quality and value of our services, and through a sound reputation as a professional, well-managed, honest and open company.

We fully comply with all competition and anti-trust laws at all times; violations of such laws are a serious matter and can result in significant penalties, severe business restrictions and reputational damage.

Amey will – seek to outperform our competition in a lawful, honest and ethical manner.

I will – only engage in fair and lawful competition.
I will NOT – enter into any agreement with our competitors or exchange non-public sensitive information which could be perceived as hindering fair competition.

Refer to the Policy on Compliance with UK and European Competition Law for further guidance.

We only use suppliers that apply the same standards of ethical behaviour as we expect of our own employees

We treat our suppliers openly and fairly and expect them to have the same ethical approach to doing business as we have. We do this by seeking to build long term sustainable relationships, and communicating with them clearly and concisely.

Amey will – treat suppliers fairly and openly and in accordance with the terms and conditions entered into to.
I will – deal with suppliers on an arm’s length basis and in a professional manner.
I will NOT – use suppliers that do not apply the same standards of ethical behaviour as Amey expects of our own employees.

Refer to Procurement and Ethical Trading Policies for further guidance.
How to raise a concern

How to raise a concern or ask a question

An employee should first consider whether the matter can be resolved locally by raising it directly with their people manager, the person breaching the Code of Ethics or by pursuing it through an existing Amey policy or procedure:

Speak to the person in question – if you see something taking place that you feel is inappropriate and against our Code of Ethics, please challenge it if you feel able. You will always have the full support of Amey’ management team in challenging inappropriate behaviour.

Speak to your / the appropriate line manager - To ensure that relevant action is taken please raise any questions you have or concerns regarding a colleague’s behaviour with your or a relevant supervisor or manager.

Whistleblowing Helpline

If you feel unable to raise the concern with the person in question or with your people manager, Amey offers an independently managed Whistleblowing Helpline (telephone 0800 160 1797).

The Whistleblowing Helpline is provided by an independent third party, who will seek to ensure that concerns about any wrongdoing or malpractice are properly raised and, if requested, responded to.

Their role is to remain totally independent, focusing on encouraging concerns about suspected wrongdoing to be reported and providing a safe conduit for them to reach the right people, speedily and unfiltered.

What happens when I call?

Employees will be asked to set out the background and history of their concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation.

Although employees are not expected to prove the truth of an allegation, they will need to demonstrate that there are sufficient grounds for the concern.

This service is strictly confidential and callers do not need to give their name if they do not want to. If they have given their name and have asked for feedback, they will be kept informed of the response from Amey and any further investigations.

What happens next?

Initial reports will be forwarded by the Whistleblowing Helpline to the Amey Monitoring Officer, who is the Group Legal Director or a representative nominated by him/her.

The Monitoring Officer will consult with the Executive Team and decide whether an investigation is appropriate and, if so, what form it should take.

Refer to the Whistleblowing Policy.
Our Code of Ethics

How I work at Amey

1. I will put the health and safety of myself, my colleagues and the public as my first priority.
2. I will not conduct, permit or condone any acts of fraud, bribery, corruption or deception and will comply with Amey’s policy on gifts and hospitality.
3. I will avoid situations in which my personal interests or actions could conflict or appear to conflict with the company’s best interests.
4. I will use Amey assets, intellectual property and systems for business use only and not for my own personal benefit.
5. I will protect confidential and personal information, and keep it secure.

How I treat others

6. I will not harass, bully or discriminate against anyone and will promote diversity, inclusion and human rights.
7. I will treat all stakeholders fairly, with integrity and respect.
8. I will respect the communities in which I work and protect and enhance the natural environment.

How I do business in the market

9. I will ensure accuracy in financial and performance reporting and communicate information honestly.
10. I will not make monetary or other donations to any political parties or candidates on behalf of Amey.
11. I will only engage in fair and lawful competition.
12. I will use suppliers that apply the same standards of ethical behaviour as Amey expects.
Key Policies to which this Code of Ethics relates:

- Health and Safety Policy
- Alcohol and Drugs Policy
- Gifts and Hospitality Policy
- Anti-Corruption Policy
- Business Ethics Policy
- Intellectual Property Policy
- Information Security Policy
- Corporate Security Policy
- Dignity at Work Policy
- Inclusion Policy
- Community and Charity Policy
- Environmental Policy
- Policy on Compliance with UK and European Competition Law
- Whistleblowing Policy
- Revenue Accounting Policy
- Procurement Policy
- Corporate Sustainability Policy
- Safeguarding Policy
- Quality Policy
- Energy Policy
- Ethical Trading Policy

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