

Policy:	Ethics & Conduct Policy	Review Period:	Annual	Issued:	03/09/2019
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Ethics and Conduct Policy

Our Policy

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

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

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

This policy has been adopted by Mabey Bridge Board resolution on 27th June 2017.

Purpose and Scope

The purpose of this policy is to provide guidance to staff on the Company’s position on ethics and conduct. Its objective is to ensure that everyone to whom this policy applies is aware that a breach of this policy may result in disciplinary action up to and including dismissal. This policy does not form part of your contract of employment. It may be amended at any time.

Mabey Bridge’s Ethics and Conduct Policy applies to all individuals working for the Company, including but not limited to officers, directors, managers, employees, contractors, trainees, interns, placement students, homeworkers, part-time and fixed-term employees and casual and agency staff and volunteers. It also applies to our representatives, distributors, and consultants, and to anyone acting on our behalf, in all our business locations and projects worldwide.

Commitments

The following commitments form the basis of our Ethics and Conduct Policy and must be adhered to by all staff:

Health and safety

We will take all appropriate steps to ensure the health and safety of everyone who works for or with us in accordance with our Health and Safety Policies.

Quality

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

Protecting the environment

We will take all appropriate steps to undertake our business in a sustainable and environmentally responsible manner.

Laws

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

Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Criminal activity: We prohibit all forms of criminal activity, including but not limited to the following:

- We will not offer, give or receive bribes or improper payments, either directly or through any third party.
- We will not defraud or deceive anyone or act dishonestly.
- We will not make facilitation payments.
- We will not offer or accept any gifts, hospitality, donations or benefits that may improperly influence a business decision or impair independence or judgement.
- We will not participate in any other criminal activity, such as extortion, collusion, cartels, breach of trust, abuse of power, embezzlement, trading in influence or money laundering, or any similar or equivalent improper act or practice.

Conflicts of interest

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

Human rights

We will respect and protect human rights.

Equal opportunity and diversity

We will treat everyone equally and encourage diversity. We employ and promote solely on merit in accordance with our Equal Opportunities Policy.

Harassment, bullying or discrimination

We will not tolerate any kind of harassment, bullying or discrimination against anyone who works for us or with us and will act all times in accordance with our Dignity at Work and Bullying and Harassment Policy.

Developing our personnel

We will help our personnel develop and achieve their potential in accordance with our Equal Opportunities Policy.

Subsidiaries and affiliates

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

Relationships with third parties

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

Procedures

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

We will monitor the effectiveness of these procedures, and will implement any improvements which are necessary to enhance their effectiveness.

We have established a Business Ethics Committee and have appointed a Senior Compliance Manager who has the necessary authority and independence to oversee the effectiveness of our procedures.

The anti-bribery aspects of our procedures are compliant with ISO 37001.

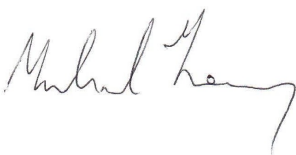
It is vital that our Ethics and Conduct Policy and supporting procedures are complied with. We will take appropriate action in the event of any non-compliance.

Reporting

If you believe that there has been any breach of, or is a weakness in, this Ethics and Conduct Policy or Mabey Bridge's procedures, please report immediately to your appropriate Mabey Bridge manager, or to Mabey Bridge's Senior Compliance Manager, Keith Mills (keith.mills@mabeybridge.co.uk).

Alternatively you can report to our independent reporting line **0800 374199 (UK)** or **+44 1249 661808 (Overseas)**. You may if you wish report confidentially or anonymously. Further information on our reporting procedures are contained on our web-site.

We will always follow up a report and take appropriate action.

A handwritten signature in black ink, appearing to read 'Michael Henry'.

Chief Executive Officer
Mabey Bridge

END