

Business Ethics Policy

Principle

Amey believes that conducting its business to high ethical standards, thereby maintaining public confidence in the integrity and corporate legitimacy of its operations, is essential for its long-term success and growth. It is also essential if we are to build and retain effective relationships with our customers, employees, shareholders, business partners and the wider community.

We will compete for business through the quality and value of our services, and through a sound reputation as a professional, well-managed, ethical and socially responsible company. We recognise that this is particularly important in circumstances where we are entrusted to manage the assets and systems of other organisations.

We will make clear our approach to specific ethical issues through the communication and enforcement of individual procedures, although we accept that ethical behaviour cannot be expressed or ensured by the written word alone.

In particular, throughout our business and in all our activities, we will:

- Develop a culture where responsible and ethical behaviour is seen as an essential and integral part of our day-to-day activity.
- Maintain and demand high professional standards, honour our commitments, and act consistently with integrity, care and diligence.
- Communicate in an open and honest manner, while fully recognising the confidentiality and sensitivity of some information in our possession.
- Build and protect the trust and confidence of all those who work with us, by listening to and respecting their reasonable convictions and interests. Respect the values, traditions and cultures of individuals.
- Demand honesty and require everyone to avoid conflicts of interest and, where they do occur, to openly declare them. Provide advice, practical help and a learning environment to support individuals in reaching appropriate decisions; our managers will lead by example. Insist that privileged information is not used for personal gain.
- Make clear our procedures for disciplining those who do not adhere to our clearly expressed standards, policies and procedures, or who break the law; we shall also support those who seek to uphold such standards or who expose the deliberate wrong-doing of others, and will establish clear procedures for this.

- Use reward and recognition systems to encourage and reinforce appropriate behaviour.
- Practice equality, avoiding discrimination, undue pressure, bullying or harassment.
- Observe legal and regulatory requirements, including those for corporate governance.
- Seek to provide a safe and healthy working environment for all our people, and for the communities in which we operate.
- Give high priority to the development and use of materials, products, processes and services, which reduce environmental damage and waste.
- Be a good corporate citizen, taking account of local and national issues in serving the communities in which we operate.
- Avoid doing business with organisations, which are seen to be in fundamental conflict with our own ethical principles.



Responsibilities

The General Counsel is the person to whom any complaint of a breach of this policy may be made if satisfactory resolution cannot be achieved elsewhere. The General Counsel is also responsible for maintaining and reviewing this policy, and for clarifying and resolving general issues. The General Counsel will oversee any audit of policy compliance, which may be considered necessary.

Line management is responsible for implementation of this policy and other related policies and procedures, including communication and detailed interpretation, monitoring and any disciplinary action in response to an apparent breach of policy.

The overall responsibility for this policy lies with the Chief Executive but can only be modified by formal agreement of the Executive Committee.

Communication

The policy will be brought to the attention of everyone at regular intervals, using a range of appropriate media and providing opportunities for questions and concerns to be fully addressed. The policy will also be communicated to other stakeholders, including customers, suppliers and business partners, as opportunity or the need arise.

This policy should be read in conjunction with a number of other Amey policies on related matters. (See Corporate Policies).

A stylized, handwritten signature in black ink, appearing to read "AM".

Andrew Milner
Chief Executive
January 2023

Revision Status

Revision	Date	Amendment	Content Owner	Mandator
6.1	Jan 2014	New document reference and template only	W Robertson	M. Ewell
06	Nov 2006	Changes made to Pg 3 Responsibilities Sentence 1: Company Secretary to General Counsel. Sentence 3: Sponsor to Chief Executive	C. Hui	M. Ewell
05	Oct. 2005	Annual Review – No changes	C. Hui	M. Ewell
02-04	July 2001 Oct. 2004	Documents held on old EDM Server	C. Hui	M. Ewell
01	Sept. 2000	Issued for Use / On old EDM Server	Company Secretary	CEO
6.2	29/11/2017	Annual review. Removal of CEO signature	Jayne Bowie	Andy Milner
7	30/06/2020	Policy Review	Jayne Bowie	Amanda Fisher
8	24/01/2023	Updated to reflect change of Chief Executive	Jayne Bowie	Andrew Nelson