



SUPPLIER CODE OF CONDUCT

CONTENTS

Introduction	2
Background	2
Who the Code Applies to	2-3
Compliance with laws	3
Reporting misconduct	3
No retaliation	3
Auditing	3
Health, safety and well-being	4
What does it mean for you?	4
Fair working conditions	5
What does it mean for you?	5
No discrimination or harassment	5
What does it mean for you?	5
Environment	6
What does it mean for you?	6
Protection of assets, property and equipment	6
What does it mean for you?	6
Confidentiality	6
What does it mean for you?	6
Protection of personal data (data protection)	6
What does it mean for you?	6
Anti-corruption and anti-bribery	7
What does it mean for you?	7
Fair competition	7
What does it mean for you?	7
Conflict of interest	8
What does it mean for you?	8
Hospitality and gifts	8
What does it mean for you?	8
How to report a concern	9-10

Introduction

Costain strive to achieve mutually beneficial supplier relationships built on common values and expected behaviours. The Costain Code of Conduct (our Codes) outlines the behaviours we expect from our employees. This Supplier Code of Conduct contains relevant portions of our Codes that apply to you as an important part of our supply chain. We encourage our suppliers to engage in constructive dialogue with us regarding our Supplier Code and doing business together.

Background

Costain are committed to conducting business in a responsible and sustainable way. We require the same of our suppliers. Our Codes and our Supplier Code are based on the values described here:

Care for Life

We care for life of people and the environment. We work safely, or not at all. We never walk by if we notice unsafe actions or situations. We support health and wellbeing. We promote green solutions and conduct our operations in a green way. We are accountable to future generations.

Act Ethically and Transparently

We do business with a high degree of integrity and full transparency. We live by our Code of Conduct and never accept shortcuts. We foster a working climate where everyone can speak their mind.

Be Better – Together

We always strive to be better in all we do. We are a learning organisation and generously share our expertise. We take pride in quality and innovation. We build Costain teams together with customers, partners and communities. We leverage diversity to deliver the best solutions. We foster an inclusive

culture where we are open and fair, showing trust and respect for each other.

Commit to Customers

We help our customers to be successful in their business. We strive to understand their needs and their customers' needs. We are here to help our customers turn their visions into reality.

Who the Code applies to

This Supplier Code applies to providers of goods and services – and their employees – in their work with Costain through a contractual agreement.

The group that we collectively call “suppliers” includes suppliers, subcontractors, service providers, professional service providers, consultants, intermediaries and agents. As a supplier, you must ensure that the practices and principles outlined in Costain Supplier Code are adopted by yourself are flowed down throughout your own supply chain.

Compliance with laws

You are required to comply with all applicable laws and with our Supplier Code, including when our Supplier Code sets a higher standard than, but does not conflict with, legal requirements. Customs or local practices never take precedence over legal requirements. If you find that our Supplier Code is in conflict with applicable legal requirements, you should inform the relevant Costain manager.

Reporting misconduct

Costain believes that a strong ethical culture depends in part upon creating an environment in which employees feel free to report instances of non-compliance with our Code or Supplier Code. Such non-compliance might include suspected illegal or unethical conduct (collectively called misconduct). We are committed to investigating reports of suspected or known misconduct, and to taking appropriate action.

Similarly, you – including your employees and your supply chain – are obliged to report to us suspected or known misconduct. Suspected or known misconduct must be reported to the relevant Costain manager for which you are working. If you prefer, you may report suspected or known misconduct confidentially and anonymously to the

Costain Code of Conduct Hotline, either by telephone or online (instructions appear near the end of this Supplier Code).

No retaliation

Costain will not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating. Similarly, you must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct. “Good faith” means that to the best of a person’s knowledge and belief, everything reported is true and that everything known is reported.

Auditing

Costain reserves the right to monitor and audit each supplier’s compliance with our Supplier Code. Accordingly, you must cooperate by providing relevant information that we request, and by making individuals accessible so Costain can conduct a meaningful audit.

Similarly, you are required to evaluate your supply chain to ensure compliance with our Supplier Code and to conduct audits of your supply chain when requested by Costain. Any non-compliance by you or your supply chain must be effectively remedied both in a timely manner and at no additional cost to us or our customers.

Breaches of the Supplier Code may negatively impact your business relationship with Costain.

Potential consequences may include but are not limited to contract termination. This provision for auditing does not relieve or limit a supplier’s obligations or responsibilities.

Health, safety and well-being

We care for our people and the people affected by our workplaces, and we continuously strive to develop a work environment that promotes health, safety and wellbeing. We aim to lead our industry in health and safety performance, with continuous, measurable improvements towards our goal of an injury-free environment. We promote and share sound personal safety and accident prevention practices with our supply chain and throughout our industry.

What does it mean for you?

- You work together with Costain and other suppliers to ensure a healthy and safe working environment.

- You ensure that your employees and others in your supply chain are:

- adequately trained, under the direction of a suitably qualified supervisor and provided with the proper Personal Protection Equipment and other equipment to safely carry out their work;
- informed, on a daily basis, by induction or a toolbox talk, of the activities they are expected to do and they are aware of all the hazards, specific to the site;
- adopt a safe system of work, identified by Risk Assessment and Method Statement
- made aware of accident and emergency procedures and the activities of other trades by a site induction;
- refer any visitors to the Costain site supervisor

In turn, your employees and others in your supply chain have a duty to tell the Costain, as the Principal Contractor, of any work situation which presents a risk to themselves, or their workmates, or of any matter which affects the health and safety of themselves or their workmates.

□ Costain requires that your operations must be carried out:-

- in strict accordance with the recommendations of SG 4:10
- Where this cannot be applied or is inappropriate, a site specific Risk Assessment and Method Statement will determine a safe system of work to be communicated to your workforce and be implemented

- You recognise that all employees have a right and an obligation to stop unsafe work.

- You report to Costain all health and safety incidents related to our project sites and in our workplaces.

Safe Attitudes = Safe Actions = Safe Conditions

Fair working conditions

We support recognised global human rights and fair working conditions for persons working on our projects, in our workplaces and in our supply chain.

What does it mean for you?

- You ensure that working conditions, hours, wages and benefits comply with applicable national and local laws and relevant UN's International Labour Organization (ILO), conventions.
- You have zero tolerance for any form of human trafficking or child, forced or compulsory labour, including such practices as the unlawful or illegitimate withholding of wages. A child is anyone below the age of 15, or below any higher minimum age specified by local law.
- You do not allow any practice that would restrict free movement of employees. Such practices can include requiring employees to hand over identification documents, passports or work permits as a condition of employment.
- You recognise and respect employees' right to freedom of association and collective bargaining, where permissible by law.
- You recognise the special needs of employees under the age of 18, and your duty of care towards them.

No discrimination or harassment

We respect all individuals and strive to work as one team, and to foster open, straightforward and respectful communication. We provide equal treatment and employment opportunities, and we do not tolerate any form of harassment or discrimination.

What does it mean for you?

- You do not tolerate disrespectful behaviour, bullying, discrimination, harassment or unwanted sexual advances.
- You do not discriminate, and you provide equal treatment and opportunities for employees and job applicants.
- You embrace and promote an inclusive culture.

Environment

We are committed to protecting the environment and believe that we can make major contributions to a more sustainable world. We actively work to improve the environmental performance of our operations, projects, products and services during their entire life cycles.

What does it mean for you?

- You conduct your operations in an environmentally responsible manner and in accordance with applicable environmental laws.
- You comply with standards required by Costain's environmental management system.

Protection of assets, property and equipment

We safeguard and protect our assets from damage, theft, loss and misuse, as they are essential to our business. Assets are either tangible or intangible. Examples of tangible assets are raw materials, money, products, machines and equipment, computers and real estate. Examples of intangible assets are our brand, patents, trademarks, know-how, trade secrets and copyrights.

What does it mean for you?

- You respect the assets of Costain and our stakeholders.
- You only use assets belonging to Costain and others as and when appropriately authorised.
- You do not tolerate the theft of assets.

Confidentiality

We respect confidential information relating to Costain and our stakeholders, and take all reasonable measures to prevent confidential information from being disclosed to any person who does not need and have a right to that information in the course of their work.

What does it mean for you?

- You ensure the protection of confidential information entrusted to you by Costain our customers and others.
- You do not act on confidential information received in error, whether it has come from Costain, our customers or others. You contact the sender and disclose the situation to Costain.

Protection of personal data (data protection)

We respect everyone's right to the protection of his or her personal data and the right to his/ her integrity in connection with processing of personal data. The definition of personal data, and the legal requirements for safeguarding it, vary by country. It could include someone's names, personal healthcare information, photographs or identity number.

What does it mean for you?

- You ensure that all uses of personal data – such as collection, registration, comparison, storage and deletion, or a combination of these – take place in accordance with applicable laws and regulations.

Anti-corruption and anti-bribery

We are committed to conducting business with a high level of integrity and we do not tolerate any form of bribery or corruption, including embezzlement, money laundering, kickbacks, extortion, fraud, nepotism (family) or cronyism (friends).

What does it mean for you?

- You conduct business with integrity, and you likewise do not tolerate any form of bribery or corruption.
- You never request, accept, pay, offer or authorise bribes, either directly or indirectly, under any circumstances. This includes never seeking to improperly influence or bribe a Costain employee, customer, or public official (including foreign public officials) or any other individual or entity.
- You do not offer or make facilitation payments, nor do you permit others to offer or make such payments on your behalf. Facilitation payments are bribes – paid to public officials to speed up non-discretionary bureaucratic processes and access services to which the payer is lawfully entitled.
- You ensure all reports, records and invoices are complete and accurate and not false or misleading.

Fair competition

We believe fair competition benefits Costain, our stakeholders and society as it drives efficiency and innovation, which are the basis of a well-functioning market economy. We are committed to fair competition and do not tolerate any violation of antitrust laws, competition laws or related regulations.

What does it mean for you?

- You practise fair competition.
- You do not participate in bid rigging by way of bid suppression, complementary or cover bidding, bid rotation, or other mechanisms that limit fair competition in tender situations.
- You do not participate in any other form of cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.

Conflict of interest

When acting as a representative of an employer or other party, we all are responsible for making decisions in the best interests of that employer or party without regard for personal gain. Conflicts of interest can be rooted in hospitality and entertainment, gifts, charitable contributions, political contributions, sponsorships and close personal relationships. Costain strive to operate in a manner in which conflicts of interests are actively avoided, and we require our supply chain to do the same.

What does it mean for you?

- You avoid situations that – in your work with Costain – may present a conflict of interest or appear to do so.
- You notify Costain if you become aware of an actual or perceived conflict of interest in your work with Costain.

Hospitality and gifts

We do not request, accept, offer, authorise or provide hospitality or gifts that may improperly influence – or create the appearance of improperly influencing – our business decisions, or decisions by our customers or others with whom we work.

Costain has established a hospitality and gifts policy that outlines acceptable circumstances and monetary limits for hospitality and gifts.

What does it mean for you?

- You do not offer or accept hospitality or gifts that may improperly influence – or create the appearance of improperly influencing – your business decisions or those of Costain, our customers or others.
- You respect and observe the hospitality and gifts policy of Costain with which you are working.
- If a Costain employee requests any type of hospitality, gift or personal service for free or at less than fair market value, you report it to Costain.



How to report a concern

You can report a concern to the relevant Costain manager, or the following information can be used to report suspected or known misconduct

anonymously to **Costain via our whistleblowing hotline**

03332 122059.