



Supplier Code of Conduct

Together we
shape, create, deliver



Our vision is to create connected, sustainable infrastructure that enables people and the planet to thrive.



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Foreword

Message from Alex

The Supplier Code of Conduct underpins our core value of integrity and is designed to ensure all of us do the right thing, all of the time. Acting in accordance with our Supplier Code of Conduct protects all of us as organisations and individuals.

I am proud of Costain's reputation in the industry and the trust we have built with our customers and the communities we work in, and we would not have achieved this without the support of our people, business partners and supply chain.

We are all responsible for ensuring we act with integrity, calling out wrongdoing and ensuring we are meeting our customers' expectations. This document provides the guidance and expectations that Costain has, and ensures that we all foster a culture that empowers people to do the right thing.

Our people, including those in our supply chain, are a vital asset and we expect anyone working with or on behalf of Costain to demonstrate that they share our values and behaviours.

As an integral part of Costain's operational delivery, we look forward to working with you to ensure this Supplier Code of Conduct is fully embedded and to drive the standards that our customers and stakeholders expect from us all.

Thank you for your ongoing support and continuing to act with integrity.

Alex Vaughan
Chief Executive Officer

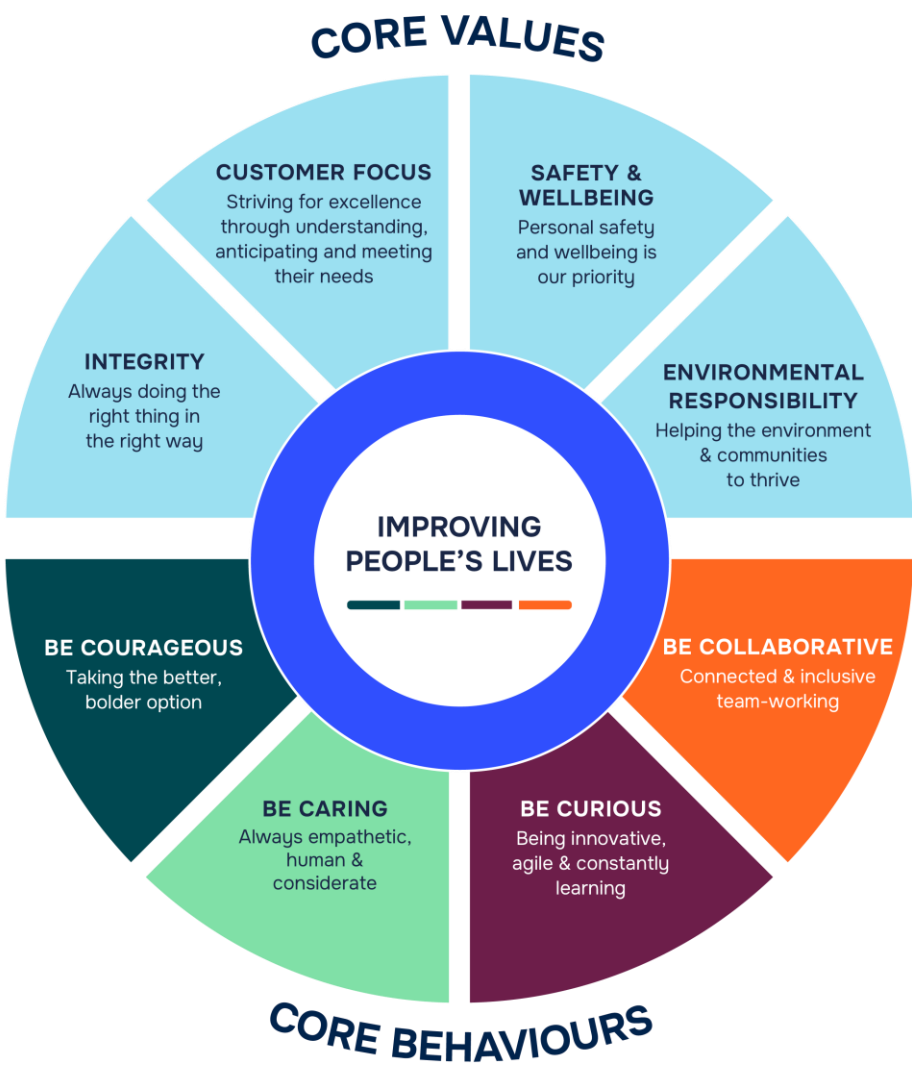


Our values

Our four values, Integrity, Customer Focus, Safety & Wellbeing and Environmental & Social Responsibility, represent what we believe in, what we stand for as an organisation and what we hold true. Our values are a guide to our behaviours and the way we work and are the cornerstone of the culture within Costain.

As a key part of our delivery team, we look to our supply chain to demonstrate they share the same behaviours in acting ethically and taking their responsibility as good corporate citizens seriously. The Supplier Code of Conduct sets out Costain’s minimum expectations when it comes to working as a supplier to Costain and are fundamental to acting ethically. Many of the key themes and expectations set out in the Supplier Code of Conduct are reflective of Costain’s culture, which is documented in Costain’s values and behaviours.

Costain reserves the right to amend the Supplier Code of Conduct when deemed necessary, including to account for changes in legislation. Adherence to Costain’s Supplier Code of Conduct is a prerequisite for all supplier engagements.



Who does this code apply to?

The Supplier Code of Conduct applies to all third parties that Costain conducts business with (“supplier”). Costain will only work with you where your standards are consistent with the Supplier Code of Conduct, and it is a requirement that these standards are flowed down throughout your own supply chain.

As a supplier to Costain, you must:

- Comply with this Supplier Code of Conduct and all applicable laws and regulations. Where the Supplier Code of Conduct sets a higher standard, but does not conflict with applicable law and regulation, you shall be held to that higher standard. If there is a conflict between applicable law and regulation and the Supplier Code of Conduct, you must inform Costain.
- Implement fit for purpose systems and controls to ensure compliance with the Supplier Code of Conduct and all applicable laws and regulations, for example, implementing policies and procedures, providing adequate training, conducting regular and comprehensive monitoring and audits both within your own organisation and on those within your supply chain.
- Ensure that your employees, agents, representatives and suppliers are held accountable to the same standards as set out in the Supplier Code of Conduct. You shall be responsible for the observance and performance by such persons of the Supplier Code of Conduct and be directly liable to Costain for any breach by such persons of the Supplier Code of Conduct.
- To ensure that Costain’s suppliers are compliant with the Supplier Code of Conduct, we reserve the right to conduct audits and inspections throughout a supplier’s engagement and for three (3) years after termination or expiry of the supplier’s engagement with Costain at any time during normal business hours. Costain and the supplier shall bear their own cost associated with any audit, unless there is a breach of the Supplier Code of Conduct, in which case the supplier will repay Costain’s reasonable costs. Such audits shall cover any relevant aspect of the supplier’s business, including its records and processes, and the supplier shall be required to give all necessary assistance to the conduct of such audit.

Who does this code apply to?

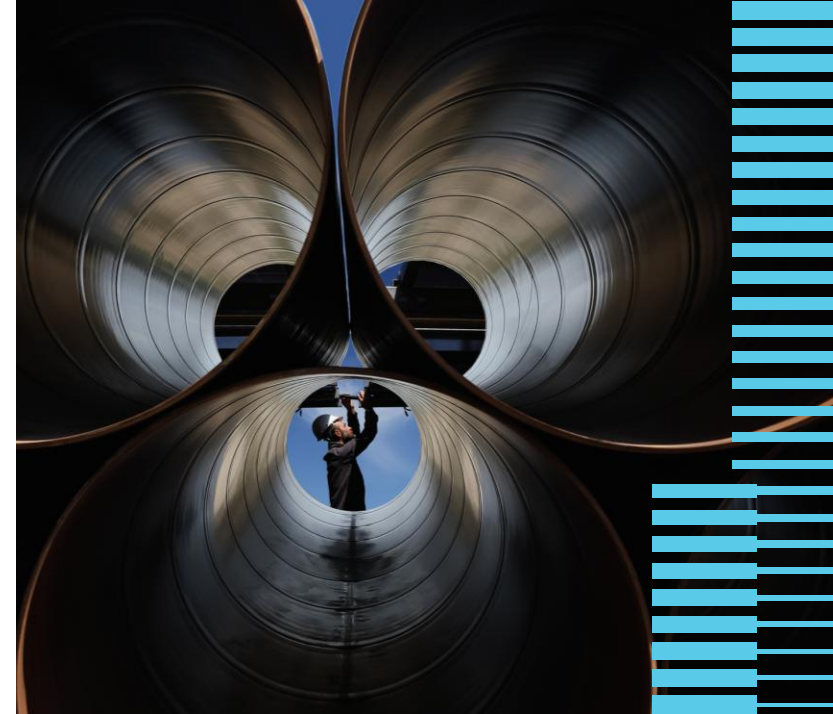
Where Costain deems that an investigation is necessary following concerns regarding the supplier's compliance with the Supplier Code of Conduct, the supplier shall use all reasonable endeavours to comply with Costain's instructions and requests¹.

Suppliers are required to keep appropriate records to comply with all applicable laws and regulations and to demonstrate continuous compliance with the Supplier Code of Conduct. Costain shall have the right to immediately access and take copies of any records and any other information held at the supplier's premises, and to meet with the supplier's personnel to audit the supplier's compliance with its obligations under the Supplier Code of Conduct. Suppliers shall also ensure that books and financial records are prepared in accordance with generally accepted accounting practices applicable in the UK, with all applicable laws, and are kept up to date².

Costain will take appropriate action where there is any failure or suspected failure to comply with the Supplier Code of Conduct or its supporting policies and documentation. Costain will have the right to immediately terminate any contract/s with you if there is a breach of the Supplier Code of Conduct. Any breach may also result in Costain ceasing to carry out business with you in the future.

¹ In the event of any conflict between this paragraph and a contractual audit right, the contractual audit right shall prevail.

² In the event of any conflict between this paragraph and a contractual right to keep records, the contractual right to keep records shall prevail.



Acting with integrity

Costain has a zero-tolerance approach to any kind of wrongdoing. Integrity is one of Costain's core values, and acting with integrity is critical to Costain's internal and external stakeholders. As a supplier to Costain, you must also act with integrity. You must not, through action or inaction, bring Costain's reputation into disrepute.

Competition law

As a supplier to Costain, you must adhere to the principle of fair and open competition and not engage in conduct which is anti-competitive, for example entering into agreements which restrict, prevent or distort competition. You must also comply with the Competition Act 1998 and the Enterprise Act 2002.

Any agreement between businesses which restricts competition (i.e. reduces or removes competition between competitors) is anti-competitive and illegal.

You warrant that you have acted, and will act, independently in the marketplace and will not engage in anti-competitive behaviours.

Acting independently means not engaging in agreements regarding pricing of bids or bidding strategies. This includes not discussing:

- **Cover pricing** - whereby competing bidders agree to submit token bids that are almost certain to fail to win the tender by virtue of being too high, not meeting the criteria of the tender, or containing unacceptable conditions.
- **Bid rotation** - whereby competing bidders take turns at being the "winning" bidder. The rotation may be based on different criteria such as size of the project, size of each participant, geographic location of projects or chronological order.
- **Bid suppression** - whereby competitors, who would normally be expected to bid for a tender agree not to submit a bid or to withdraw an existing bid to ensure that the predetermined bidder "wins"..
- **Sub-contract bid rigging** - whereby competitors agree not to bid (or to bid too high) on the basis of some form of understanding that parts of the successful contract will be awarded to them as subcontractors.

Not engaging in anti-competitive behaviours in relation to information sharing, includes:

- Not sharing information about pricing relating to your work for Costain, whether current or future, or other elements of pricing (e.g. profit margins or labour costs).
- Not holding discussions or entering into arrangements or agreements with competitors in relation to the terms and conditions upon which you will contract with Costain.

Preventing bribery and corruption

As a supplier to Costain, you must comply fully with the Bribery Act 2010 and all applicable laws, statutes, regulations and codes relating to anti-bribery and anti-corruption, including not doing anything to cause Costain to breach such legislation. You shall not engage in any form of bribery or corruption. This includes offering or receiving bribes, failing to prevent bribes made on behalf of the supplier's organisation and/or bribing (or seeking to bribe) a public official.

You are prohibited from offering, making or paying any facilitation payments to any third party including, but not limited to, public officials. Costain deems a facilitation payment to be an unofficial payment to encourage the recipient to perform their existing obligations or role or expedite or refrain from performing a routine task they are otherwise obligated to do. Such routine tasks can include, but are not limited to, obtaining permits, licences or other official documents, processing governmental papers, such as visas and work orders, or providing power and water supply and loading and unloading cargo.

You warrant to Costain that you have not received or provided any request or demand from any Costain employee for any inappropriate financial or other advantage of any kind in entering into your agreement with Costain. You will promptly report to Costain any request or demand for any inappropriate financial or other advantage of any kind that you have received from any other party in connection with your performance of your agreement with Costain.

You must not make any political contributions by, on behalf of, or in the name of, Costain.

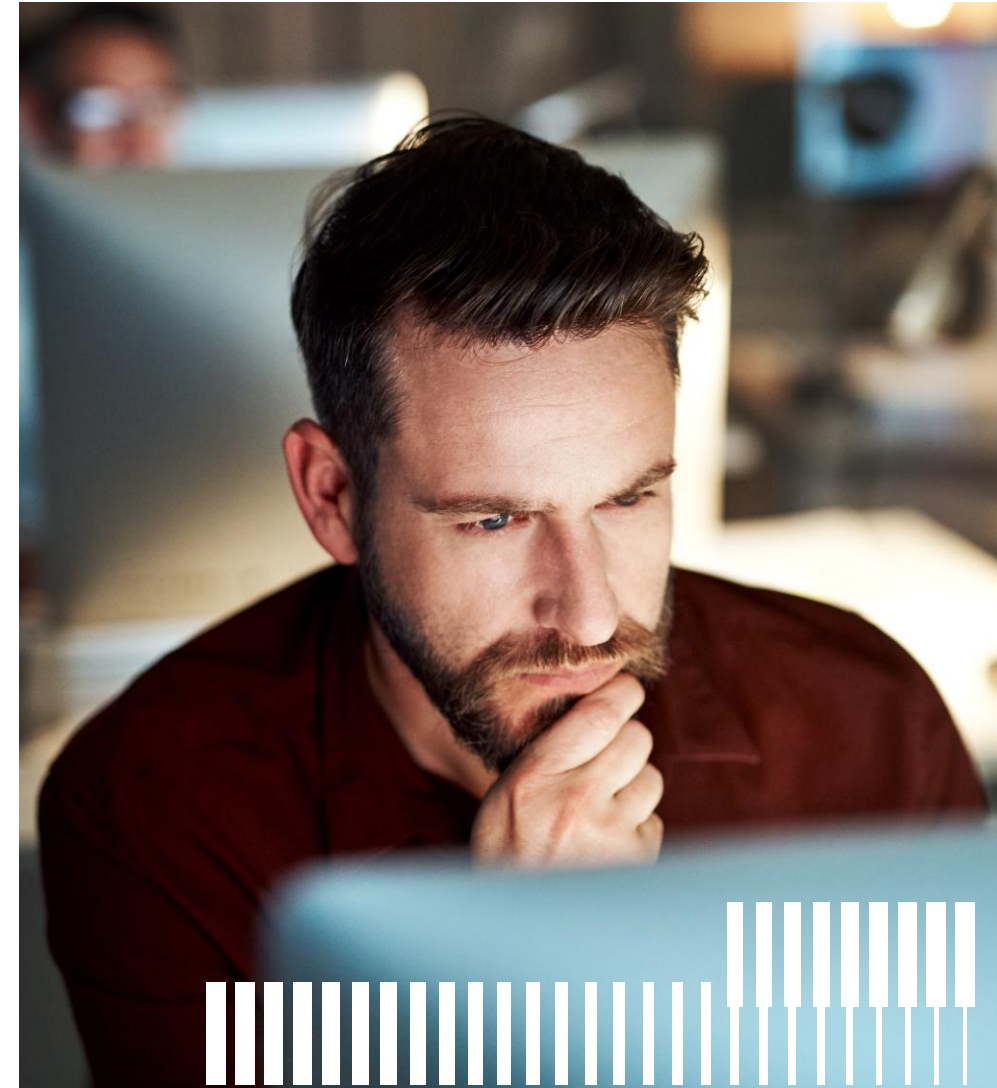
You must not make any charitable contributions or pledge any sponsorship by, or on behalf of, or in the name of, Costain unless it is stipulated in the contract or prior written approval is sought from Costain's General Counsel at

legal.documents@costain.com

Counter fraud, deception and dishonesty

Costain has a zero-tolerance approach to fraud of any kind, within its own business and that of its suppliers.

As a supplier to Costain you must fully comply with Costain's Counter Fraud Policy, as amended from time to time, which is available at <https://www.costain.com/costain-policies>.



Conflicts of interest

Costain defines a conflict of interest as occurring when competing interests impair the ability to make objective, unbiased business decisions. Competing interests can be of a personal or business nature.

As a supplier to Costain, you must ensure that you have implemented a policy and procedure to document personal or organisational actual, potential or perceived conflicts of interest. Where there is a conflict of interest which relates to Costain, its employees or customers you shall without undue delay inform Costain, in writing, of such conflict and all mitigation measures that you have put in place to negate the risks associated with the conflict.

Examples of types of conflicts of interest may include but are not limited to:

- One of your employees owning shares in a competitor of Costain, where that employee is working on a tender for Costain and that competitor is bidding against Costain.
- One of your employees having a close family relationship (e.g. marriage or parent/child) or long-term friendship with a Costain employee (in circumstances where that employee is having to make judgments in relation to your company as part of its role in connection with Costain).
- Where your employee recently worked for Costain, and that employee has knowledge which may give you an unfair benefit.
- Where one of your employees has worked for a customer and is now supporting Costain to prepare a tender for that customer (certain customers treat this as a 'conflict' and it can result in a bidder being disqualified if the conflict is not notified to the customer and mitigated).

Gifts and hospitality

Costain has a strong stance on gifts and hospitality and has strict guidelines on what can and cannot be offered or accepted. As a supplier to Costain you must never offer and/or accept anything that could confer improper advantage, or create an actual or perceived sense of obligation, or otherwise influence decisions.

Offering of frequent invitations to events or functions and/or where the hospitality is expensive or lavish may lead to you being at risk of accusations of bribery.

The offering of Trivial Gifts and Trivial Hospitality may be permitted depending on the circumstances. If you are involved in an active bid or tender with Costain or the Costain representative is involved in making a critical financial decision, all gifts and hospitality is prohibited.

Costain defines “**Trivial Gifts**” as:

- An occasional unsolicited promotional gift (i.e., items such as stationery, pens, diaries that bear the logo or company name of another organisation, provided these have no commercial value).
- Low value items that, by virtue of their nature or branding, have no material commercial value.

Costain defines “**Trivial Hospitality**” as:

- Modest working lunches.
- Meals and drinks offered to Costain representatives whilst they are attending organised courses, conferences, seminars, and workshops which are paid for by Costain.

Costain defines “**Costain representatives**” as: all people working for Costain, including those who are directly employed, agency workers, temporary workers, personnel with a ‘workingwithcostain’ email address, secondees and board members who act on Costain’s behalf or with whom Costain conducts business and their spouses, partners, children, parents or other associates.

You are prohibited from offering to (or receiving from) Costain or any Costain representative gifts and/or hospitality relating to any kind of sporting event(s) e.g., golf, rugby, football, cricket, sailing, horseracing, etc., including any sporting event(s) held for charity.

You must ensure that you have implemented a policy and procedure to document all gifts and hospitality offered to or received from Costain or Costain representatives.

Sanctions, trade and import

Several organisations implement sanction regimes such as government bodies like the Office of Financial Sanctions in the UK, the Security Council of the United Nations, and the European Union. These can be embargoes against countries or specific territories or targeted against specific businesses or individuals.

Costain expects its suppliers to:

- Comply with all relevant local and international laws relating to the movement of goods and services.
- Obtain all necessary licences to import goods into the UK.
- Provide accurate and truthful information to customs authorities.
- Make sure all duties, levies and taxes are paid.
- Undertake due diligence on suppliers and customers so that we know who we are dealing with and can check against sanctions watchlists.

Suppliers must never:

- Import prohibited or restricted goods into a country without declaring them.
- Engage in restrictive trade practices or illegal / unofficial restrictive trade practices.

Anti-facilitation of tax evasion

Costain is committed to the mitigation of the risk of tax evasion and facilitation of third-party tax evasion anywhere within the organisation, in the UK or overseas.

As a supplier to Costain you must ensure you are:

- Promoting a zero-tolerance approach to tax evasion and facilitation of tax evasion in your business and that of your business partners.
- Fully investigating all reports or suspicions of dishonest behaviour, ensuring that perpetrators are subject to full disciplinary procedures as well as civil and/or criminal action being taken where appropriate.
- Encouraging staff and third parties, including business partners, to report reasonably held suspicions of tax evasion, confidentially, whilst guaranteeing that no employee making such a report in good faith will suffer as a result of doing so.
- Providing the facility of a confidential helpline which can be used by staff and third parties including business partners to raise issues of concern.
- Promoting awareness of tax evasion risks and requiring management to implement a sound and effective system of both preventative and detective controls.



Health and safety

Eliminating harm

Protecting the environment and personal health and safety are core values and at the heart of everything we do. Working together we aim to eliminate safety, health and environmental harm across the business.

Costain recognises the importance of occupational health, safety (including process safety) and the environment in the successful operation of its activities. There is nothing more important than preventing harm.

We expect everyone engaged on our contracts to hold Safety, Health and Environment as a core value and not misuse anything provided in the interests of health, safety or welfare. Any deliberate violations will be considered a breach of the Supplier Code of Conduct.

We expect any organisation working with us to have assessed the competency of personnel prior to engaging them to support our contracts to ensure that they have the required knowledge, ability, training and experience to undertake their role without causing harm to themselves or others.

At induction everyone working with Costain will be given a Be Safe Commitment Card. It will be explained that this is the commitment from the Executive Board that nobody is expected to carry out any task that is likely to cause injury or harm, and the individual is authorised to stop work if they feel the situation is unsafe. We expect the leadership teams from organisations working with us to support this position and reinforce it with their teams. If any situations arise where people are being pressured or forced to work in a manner likely to result in harm, this will be considered a breach of the Supplier Code of Conduct.

It is vital to Costain that our organisation, suppliers and industry learn from unplanned events (incidents or assurance findings). When events occur, we expect the organisations involved to play an active role in the investigation to understand both technical and behavioural factors that contributed to the event and share learning.

Fit to work

Costain expects any organisation working with us to support the position that Costain takes for staff in taking reasonable steps to ensure their people are fit for work. This includes:

- Statutory health surveillance where a risk assessment identifies exposure to a health hazard that requires surveillance
- Safety Critical Medicals for those in an occupation covered by the Safety Critical Workers Protocol
- Individual risk assessment where an individual has a health condition that requires control measures
- Access to an Employee Assistance Programme.
- Drugs and alcohol awareness and testing - as a supplier to Costain, you must comply with Costain's Drug & Alcohol Policy, as amended from time to time, which is available at: <https://www.costain.com/costain-policies>. For the avoidance of doubt, anyone engaged by you shall not consume, sell or report for duty under the influence of illegal drugs, misused legal drugs (including solvents) or alcohol. Costain reserves the right to test anyone if any of the above are suspected, test routinely at induction, and undertake random testing at any of Costain's sites or offices.

Anyone who refuses to undertake a test or receives a positive test result will be excluded from Costain's sites and offices and must be subject to your or their employers' disciplinary procedures.

We expect you to support to anyone who voluntarily declares a drug, alcohol and substance related addiction or habit, to ensure they are provided with the appropriate advice and guidance.



Environmental sustainability

“Environmental and Social Responsibility” is one of our core values at Costain and we are committed to protecting and enhancing our environment and helping communities thrive.

We actively work with our suppliers to reduce the impacts of services and materials and develop sustainable solutions that contribute to tackling the industry’s contribution to climate change and nature degradation in line with our environmental, social, governance programme targets. If you would like to understand more about Costain’s environmental, social and governance programme, please visit: www.costain.com/sustainability.

Suppliers must deliver work in an environmentally responsible manner that ensures compliance with all applicable environmental laws and the standards required by Costain’s environmental management system.

Our Climate Change Action Plan sets out our pathway to net-zero emissions and each organisation in Costain’s suppliers must have a plan in place, or be working towards one, to transition their own business to net zero. All suppliers must work in accordance with the requirements of Costain’s PAS2080 Carbon Management System, ensuring collaboration throughout and bringing best practice and innovation to their solution.



Environmental sustainability



We require all suppliers to always:

- Ensure they are aware and actively working to reduce the environmental impacts of their products and/or services and propose the most sustainable solutions.
- Understand their own emissions including those of their products and services and have a reduction plan in place.
- Proactively engage with Costain to provide low-carbon solutions and challenge traditional specifications or methods.
- Supply sustainably sourced materials to recognised standards such as FSC, PEFC, BES6001 etc. Materials must comply with Costain's EGD-I-1200- Materials and Product List.
- Only supply plant which complies with Costain's Plant Specification (SHE-T-471) and aligns to the Supply Chain Sustainability School Plant Standard.
- Where specified, use telematics to monitor, manage and reduce fuel usage, through behaviour change and technology. Suppliers are to provide live data on selected equipment in a format that aids the project's operational and enabling teams.
- Seek to use alternative sources of energy to replace or reduce hydrocarbon use, prioritising grid energy and renewables, and demonstrate the sustainability of alternative fuels including hydrogen, biogas and biofuels.
- Support Costain in its commitment to reaching zero avoidable waste by identifying circular economy opportunities and eliminating avoidable waste.
- Contribute towards protecting and enhancing nature within and surrounding our project sites by, for example, reducing land take and minimising direct impacts/damage.
- Minimise water use, protect water quality and use best practicable means to minimise noise and air quality impacts.
- Supply on time all required environmental data, including where applicable monthly data on material use and associated transport, energy and fuel use, waste, water and commuting.

Quality



Achieving right first time is a key requirement of Costain and our customers. Suppliers must have robust controls in place to ensure their works – products, equipment, resources, designs – are fully compliant with all design, performance requirements and regulatory obligations. Placing substandard products or designs into build projects can have a significant impact on our projects, customers and our teams through safety impacts, rework and waste.

Suppliers must always:

- Produce and deliver compliant work to Costain and our customers.
- Share quality non-conformance or defects collaboratively and ensure they are resolved prior to incorporation into the project to avoid delay or rework, supporting predictable delivery.
- Supply quality data as requested to meet Costain's reporting requirements.
- Keep detailed records of their work, including any sub-suppliers.
- Engage in industry and Costain quality improvement initiatives, sharing lessons learnt, best practice and innovations.
- Use competent teams and proven methods to produce their work.
- Work in an efficient method to reduce waste at source.

Suppliers must never:

- Conceal defects or deviations.
- Accept and/or deliver work that is outside of their competence.
- Falsify or amend records of completed work and/or materials.

Design – safe by design

The realisation of design is a key part of Costain's business. Our success depends on the delivery of high quality, constructable and compliant design that meets the needs of Costain, customers, stakeholders and regulators.

All design – from concept through to temporary and permanent construction works – must be clearly communicated and meet the needs of the construction and fabrication teams.

As part of the Construction (Design and Management) Regulations all designers must seek to mitigate risks at all stages of the project life and clearly show any remaining residual risks to ensure the safe-by-design concept is embedded.

Suppliers must always:

- Design out harm to achieve safe by design.
- Engage and share to deliver a best value solution.
- Deliver a clearly communicated, efficient and low carbon design solution.
- Be clear on assumptions, exclusions and follow on design work required by others.

Suppliers must never supply a design:

- That does not meet the requirements or regulations.
- Could be considered unsafe or overly complex to build.
- Specifies prohibited materials or those products that may be considered harmful.

Respecting everyone

Diversity and inclusion

We believe that to foster a truly inclusive culture, every colleague working for and with Costain should feel a sense of belonging and empowerment to bring their true selves to work. We are committed to creating a positive environment where everyone shares ideas, questions, concerns, or mistakes, without fear of punishment for doing so.

We want to work with suppliers who share our core values. It is important to us that the largest possible pool of talented resources is available to work in our industry and to achieve their full potential, thereby achieving best outcomes for suppliers, Costain and our customers. We encourage suppliers to consider using external accreditations (e.g. Disability Confident, Armed Forces Covenant) to make their business practices more inclusive of all identities.

- We expect our suppliers to mirror our zero-tolerance approach towards non-inclusive behaviours, including discrimination, bullying, harassment and victimisation.
- We are committed to creating an environment free of this behaviour where everyone is treated with dignity and respect.
- No employee, worker, customer, supplier, subcontractor or any other third party should feel threatened, intimidated, or degraded. An individual suffers a breach of the right to dignity if they experience any acts of harassment, victimisation or bullying, omission or conduct which causes them to be alarmed or distressed.
- No employee in the provision of our services should discriminate against or harass any other employee, member of the public, subcontractor, supplier, customer or any other third party. Costain expects its suppliers to treat everyone with dignity and respect.

Non-inclusive behaviours, such as using offensive language, threatening behaviour, ridicule, inappropriate language, unnecessarily interfering with another's work or spreading malicious rumours will not be tolerated in our workplaces. We reserve the right to remove any personnel from any Costain site or office who consistently demonstrates non-inclusive behaviours, and it may impact on our ability to work with a supplier in the future.

Employment and working conditions

We place high importance on the welfare of our entire workforce and expect anyone working on behalf of Costain, including in our suppliers to be employed on a fair contract where wages are no less favourable than those laid out by the Construction Industry Joint Council for the Building Industry, the Civil Engineering Contractors Association or the recognised wage-fixing body which applies to the works.

Where this is not applicable, we expect that wages are as a minimum in line with the national minimum wage.

Suppliers are also expected to comply with the Immigration, Asylum and Nationality Act 2006.



Modern slavery

Costain is committed to operating responsibly and with high ethical standards, particularly regarding human rights issues. We will not tolerate human trafficking or other kinds of slavery within our operations.

Costain suppliers must ensure as a minimum:

- That they have implemented appropriate modern slavery due diligence activity for their own supply chain and other related organisations.
- That child labour (a child is anyone below the age of 15, or below any higher minimum age specified by local law) is not employed to deliver goods and/or services to Costain. Costain strictly forbids the use of child labour.
- All workers have freedom of movement and no worker-paid recruitment fees, compulsory overtime, and confiscation of original identification documents occurs.
- All recruitment is carried out in a fair and transparent manner and compliant with relevant legislation and standards. Any form of coercion or exploitation is strictly prohibited.

- That employees have access to remedy where modern slavery, labour exploitation or human trafficking practices are identified.
- That Costain is promptly notified of any suspicions or evidence of modern slavery, labour exploitation or human trafficking within the supplier's supply chain.



Wellbeing

“Safety and Wellbeing” is one of Costain’s core values. Wellbeing is at the heart of everything we do at Costain. All Costain’s suppliers must place paramount importance on the wellbeing of their workforce, on two levels: workplace wellbeing and employee wellbeing.

Workplace Wellbeing

Suppliers must address workplace wellbeing through:

- Creating a culture of health, safety, environment, respect, and inclusion.

This can be achieved by suppliers adhering to the Supplier Code of Conduct, particularly the sections on Health & Safety, Environmental Sustainability, Diversity & Inclusion and fully participating in all wellbeing campaigns and activities invited to by Costain.

- Developing open, honest, and empathetic communication.

This can be achieved by suppliers equipping their senior leadership teams, line managers, supervisors, and foreperson with the knowledge and skills to have open communication, and to actively listen to all concerns and issues raised and take appropriate action.

- Providing information, resources and support in a caring way.

This can be achieved by encouraging the use of an employee assistance programme. Where the supplier does not have its own employee assistance programme, it should request the use of Costain's employee assistance programme, details of which can be requested from myreward@costain.com

Supporting employees to look after their mental health and wellbeing.

Costain expects this to be achieved by suppliers signing The Mental Health at Work Commitment to provide a work environment that supports mental health and wellbeing. www.mentalhealthatwork.org.uk/commitment/standards

Wellbeing

Employee Wellbeing

Suppliers must address employee wellbeing through:

- Enacting policies and procedures to mitigate and manage stress and work/life balance.

This can be achieved by suppliers ensuring that they have policies and procedures that help their employees develop boundaries to ensure work/life balance and reduce stress.

- Offering learning and career opportunities.

This can be achieved by suppliers offering both formal and informal internal and external learning and development opportunities and keeping records of all training which can be produced on request.

- Providing relevant resources and access to mental health support services.

This can be achieved by encouraging use of an employee assistance programme. Where the supplier does not have its own employee assistance programme, it should request and encourage use of Costain's employee assistance programme via myreward@costain.com

Suppliers can also signpost individuals to charities, such as

- Mind www.mind.org.uk
- The Mental Health Foundation, www.mentalhealth.org.uk
- Samaritans, www.samaritans.org



Data privacy, IT and security

Protection of assets, property and equipment

Costain safeguards and protect its assets from damage, theft, loss and misuse, as they are essential to its 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 company's brand, patents, trademarks, know-how, trade secrets and copyrights.

Suppliers must ensure:

- Any assets, property or equipment provided by Costain or stakeholders will be respected and only used for the intended purpose.
- They only use assets belonging to Costain and others as and when appropriately authorised.
- They do not tolerate the misuse or theft of any assets.



Cyber and information security

Costain is committed to managing all information in accordance with legislation, best practice and ISO 27001. Appropriate protection is required for all forms of information to ensure business continuity and to avoid breaches of the law, regulatory and contractual obligations. The overall objective is to treat information appropriately and in accordance with the risks associated with it.

Costain monitors the use of ICT systems, and access to any information stored on our ICT infrastructure, in line with current legislation and guidance as set out in our ICT Monitoring Management policy, as amended from time to time, which is available at: www.costain.com/costain-policies.

This means suppliers must:

- Protect information from unauthorised access at all times, whilst at rest and in transit.
- Maintain the confidentiality, integrity and availability of information at all times.

- Implement access control (restricting access to certain information to authorised persons) across all networks, IT systems, data and services that contain Costain or Costain customer information.
- Understand the sensitivity of the data they use, and hold and treat it accordingly.
- Report, investigate and resolve all breaches of cyber and information security, actual or suspected, involving Costain or customer information or IT infrastructure (direct or indirect interaction). They must report any incidents to Costain in a timely fashion and share (as appropriate) any lessons learnt.
- Keep all authentication methods, including usernames and passwords, certificates, digital keys etc to Costain systems or supplier systems that connect to Costain infrastructure secure at all times, e.g. not shared nor written down.

Generic IT accounts are not permitted as a means of accessing any Costain data. Users are accountable for their actions on the Costain ICT systems. Authorised users should use Costain ICT for Costain business activities only.

Costain must be provided with advanced notice, or upon discovery, when an IT user account is no longer required, e.g. a person transferring from a project or leaving the business.

Personal data

As a supplier to Costain we expect you to ensure that personal data is handled in accordance with the Data Protection Act 2018 and the retained EU law version of General Data Protection Regulation (EU) 2016/679 (UK GDPR)(together the “Data Protection Legislation”) and any other applicable laws and regulations. Data Protection Legislation regulates the capture, storage and use of information about individuals, known as "personal data".

Costain’s suppliers must ensure that:

- There are individuals within the supplier’s organisation who can provide advice and assistance on issues arising under Data Protection Legislation.
- Everyone managing and handling personal data understands that they are responsible for following good data protection practices.
- Everyone managing and handling personal data is appropriately and adequately trained.
- Queries about handling personal data are promptly dealt with.
- Procedures for handling personal data are clearly described.
- A regular review is made of the way personal data is managed.

Confidential information

As a supplier to Costain, you must keep all Costain information strictly confidential. You are required to have in place appropriate measures to protect the integrity and confidentiality of information received. The measures that you put in place must be no less than those that are in place to protect your own confidential information, and must be reasonable measures as a minimum.

Protection of Costain’s confidential information is especially important when it comes to ensuring that the UK Market Abuse Regulations are adhered to. As a supplier to Costain, you must ensure that you (and your employees): (i) do not release any ‘inside information’ relating to Costain to anyone; and (ii) do not trade in Costain shares when privy to such ‘inside information’.

Where you believe that you have received information in error, you shall inform Costain without undue delay and ensure that any such information has been securely deleted or destroyed.

Marketing and communication



Costain is a public limited company (PLC), and it is important that information is released in a consistent and co-ordinated manner, even when it relates to its subsidiaries and affiliates.

Costain appreciates that suppliers want to promote the good work that they are doing, but they must seek approval from Costain's Group Communications Team (communications@costain.com) to ensure that the information suppliers are sharing (including via social media) meets our requirements.

Where information is published without Costain's consent, Costain will ask suppliers to remove it. Failure to do this may impact on Costain's ability to work with them in the future.

Costain policies



The Supplier Code of Conduct sets out Costain's requirements for our suppliers in language that highlights our expectations. Copies of all Costain Policies referenced within this document are available on our website at: www.costain.com/costain-policies/.

If you are unable to find the relevant policy, please contact procurementdepartment@costain.com in the first instance.

Raising a concern

Where there is any actual or suspected breach of the Supplier Code of Conduct, you are required to speak up and report any concerns through Costain's independent whistle-blowing hotline and website, EthicsPoint. The platform allows communication between the reporting individual and Costain whilst maintaining the reporting individual's anonymity. Any concerns are managed by an independent team within Costain.

Where there are any concerns, these can be reported using the following methods:



0800 102 6576



https://secure.ethicspoint.eu/domain/en/report_custom.asp?clientid=109043

As a supplier to Costain, you shall not retaliate or take disciplinary action against any individual that has, in good faith, reported a concern, or who has sought advice regarding the Supplier Code of Conduct, in line with the Public Information Disclosure Act 1998.

