

THE AMEY CODE

Personal pride in our public service

EMPOWER | ENGAGE | EXCEL



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Introduction

Thank you for taking the time to read the Amey Code and to understand how we expect everyone who works for and with Amey to conduct themselves. The Amey Code applies to every single permanent, temporary and agency employee, people engaged by our subsidiaries and our suppliers.

Every day, we all make decisions that can affect others, our contracts and the Amey group as a whole. I am resolutely focused on ensuring employees all have freedom to perform and make the right decisions while engaging and empowering others to excel. In doing so, we must consistently uphold the highest standards of conduct and ethics in how we work and the way Amey operates.

Everyone who works for and with Amey is expected to ensure that:

- We treat everyone with respect
- We conduct our business responsibly and with integrity
- We do not misuse property or information

The Amey Code sets out the Amey way of doing things and will help us continually be the organisation that our customers want to do business with, the company communities want working for them and the place where we all want to work.

I ask that every single employee not only reads this document but commits to following the spirit of the Amey Code and applies it to their everyday working life.



Amanda Fisher
Chief Executive Officer



Our business strategy and guiding principles

At Amey we take personal pride in our public service.

We are one of the top five suppliers for support services in the UK and we employ 16,000 people. Every household in Britain benefits from the work we do.

This is underpinned by our leading consulting capabilities, which use engineering design and data analytics to ensure we constantly strive for sector-leading innovation.

For Amey, it is all about our people. 'Freedom to Perform' is supported by three guiding principles:

- **Empower** – responsibility and accountability for your part of the business to use your expertise to deliver great public services.
- **Engage** – listening, responding and acting - giving everyone a voice and taking action based on that information.
- **Excel** – being empowered to engage your teams and customers to excel in what you need to achieve.

We know how to get things done and use our expertise and experience to deliver for the nation. We won't stand still. We will keep investing in skills, education and training so we can continue learning and providing opportunities across the country.

By doing this we will drive performance improvements across the business, and better outcomes for our customers.



The Amey Code

WE TREAT EVERYONE WITH RESPECT

1. We promote fair and inclusive workplaces and do not tolerate harassment, bullying or discrimination.
2. Our goal is to ensure we have safe service delivery for our employees, customers and members of the public; providing a safe place to work.
3. We respect and protect human rights.
4. We respect our stakeholders and the communities we live in and serve.

WE CONDUCT OUR BUSINESS RESPONSIBLY AND WITH INTEGRITY

5. We do not permit or condone any act of fraud, bribery, corruption or deception.
6. We avoid or manage situations where personal interests or actions could conflict or appear to conflict with the Amey's best interest.
7. We avoid undue influence through giving or accepting gifts and hospitality or making donations to political parties.
8. We only engage in fair and lawful competition.
9. We protect our natural world, minimising our impact on the environment.
10. We only work with suppliers that apply the same standards of ethical behaviour as ourselves.

WE DO NOT MISUSE PROPERTY OR INFORMATION

11. We protect information and everyone's privacy.
12. We only use Amey assets, intellectual property and systems for work purposes.
13. We communicate honestly and report accurately.

WHO DOES THE AMEY CODE APPLY TO AND WHAT DOES IT MEAN IN PRACTICE?

The Amey Code applies to all permanent, temporary and fixed term employees, agency workers, contractors and people engaged by our suppliers. It relates to the way Amey and all its people conduct themselves with customers, colleagues, suppliers and the communities we work in.

We only work with third parties who uphold the same standards as we do. This includes joint venture partners, sub-contractors and suppliers.

If you work for or with Amey, you are responsible for understanding the Amey Code and the related policies, and for asking questions when you are unclear about anything.

Failure to adhere to the Amey Code will result in the appropriate action being taken against those individuals.

We treat everyone
with respect

We treat everyone with respect

We promote fair and inclusive workplaces and do not tolerate harassment, bullying or discrimination.

Amey is committed to achieving an inclusive working environment that values equality, diversity and inclusion. Everyone has an equal opportunity to fulfil their potential and “be their best”.

This means that we promote a mix of people, treat everyone fairly and respect differences in a culture where everyone can participate equally no matter their background, identity or circumstances. The result is that people feel valued, comfortable and confident to be themselves in a way that suits them and delivers business needs.

In practice, respecting and accepting people for who they are by making adjustment or alternative interventions to remove barriers for people regardless of age, disability, gender reassignment, marriage & civil partnership, race, religion or belief, sex, sexual orientation and pregnancy or maternity.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** maintain a supportive, inclusive work environment that is free from discrimination, harassment, victimisation and bullying, and encourage and support those who report such behaviour
- ✓ **I will** hire the best candidates for jobs, ensuring they are appropriately qualified
- ✓ **I will** respect that diversity brings value to our work environment
- ✓ **I will** promote talent based on merit
- ✗ **I will not** accept any kind of discrimination
- ✗ **I will not** make inappropriate jokes, try to humiliate a colleague or spread gossip and rumours
- ✗ **I will not** threaten a colleague with physical or verbal violence
- ✗ **I will not** communicate, use language or engage with colleagues or any stakeholders in a manner that is offensive to them, derogatory or unlawful or which might damage Amey’s reputation

For further detail, please refer to the following Amey policies:

- Inclusion
- Safeguarding
- Dignity at Work
- Flexible Working
- Recruitment & Selection

Our goal is to ensure we have safe service delivery for our employees, customers and members of the public; providing a safe place to work.

At the heart of our approach to health and safety is the belief that all harm is avoidable and that there is no such thing as an inevitable injury.

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 also respect the importance of people feeling able to bring their whole self to work; for them to be aware of their own wellbeing and to raise a concern if that may affect their ability to work safely.

Our Safety Code:

- ✓ **I am ready to go**, fit and well
- ✓ **I am kitted out**, with the right tools, equipment and competence
- ✓ **I will stick to the plan** and re-asses if things change
- ✓ **I will stay alert**, aware of risks and hazards
- ✓ **I will ‘Shout Out!’** if I have concerns about my own or anyone else’s safety

Everyone who works for and with Amey is expected to adhere to these ways of working:

- Health & Safety
- Alcohol & Drugs
- Wellbeing

We respect and protect human rights.

We do not exploit anyone. We uphold the rights of all those who work for or with us and of the communities in which we operate.

This means refusing to do business with any person, company or organisation that fails to uphold the standards and principles of basic human rights or has links with an oppressive regime that give us cause for concern.

We do not tolerate forced, debt-bonded, indentured labour practices or human trafficking. In the UK, we expect every party who we have dealings with to adhere to the principles of the Modern Slavery Act 2015, as we do ourselves.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** protect human rights
- ✓ **I will** support the principles of the Modern Slavery Act 2015, to prevent slavery and human trafficking
- ✓ **I will** encourage employees and suppliers to identify any person they think may be at risk from these practices so we may help them

For further detail, please refer to the following Amey policies:

- Slavery & Human Trafficking Statement
- Working Hours

We respect our stakeholders and the communities we live in and serve.

Our stakeholders include, but are not limited to, our employees, agency workers, customers, partners, suppliers, contractors and subcontractors, shareholders, governments, regulators and the communities where we work.

Delivering services across almost every area of the UK means we have a huge impact on local communities.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** develop constructive relationships with all stakeholders, treating them with respect and professionalism
- ✓ **I will** work with stakeholders to resolve disputes at the earliest stage
- ✓ **I will** have a clear understanding of what our customers require from us
- ✓ **I will** work with communities to understand how we can help them to improve their wellbeing
- ✓ **I will** listen to the concerns of local communities and, wherever we can, act to mitigate them
- ✗ **I will not** communicate with or engage with Amey stakeholders in a manner that is derogatory or unlawful or which might damage Amey's reputation
- ✗ **I will not** knowingly disrespect the people or communities we serve

For further detail, please refer to the following Amey policies:

- Social Value
- Volunteering

We conduct our
business responsibly
and with integrity

We conduct our business responsibly and with integrity

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

Compliance with the law is the minimum standard of conduct required by Amey.

It is essential for us to conduct our business in full compliance with the law and to ensure that our dealings with all concerned are conducted professionally, fairly and with integrity in an open, honest, transparent and corruption-free environment.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** always ensure they conduct themselves in line with Amey and client policies, acting honestly and openly
- ✓ **I will** base all invoices on clear and complete information and check that they comply with contractual arrangements
- ✓ **I will** report any attempts to bribe or solicit bribes from themselves or the company
- ✓ **I will** carry out any assessments or valuations accurately and completely and maintain accurate records
- ✗ **I will not** conduct, permit or condone any acts of fraud, bribery, corruption or deception
- ✗ **I will not** falsify records or make claims for work or activities that have not been properly incurred
- ✗ **I will not** ignore something that I suspect might involve fraud, theft, deception or dishonesty

For further detail, please refer to the following Amey policies:

- Anti-Corruption
- Anti-Fraud
- Travel
- Expenses

We avoid or manage situations where personal interests or actions could conflict or appear to conflict with the Amey's best interest.

Conflicts of interest arise if you participate in or promote activity in which you have a personal interest or that personally benefits you or your families or friends, or which might interfere with our ability to carry out our responsibilities to our customers and others. These may include:

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

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

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **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 them or their team personally in a way that is not sanctioned by the business or to engage in any activity that places them in an actual or apparent conflict of interest with Amey or its customers or suppliers

We avoid undue influence through giving or accepting gifts and hospitality or making donations to political parties.

Amey operates in an open and transparent manner and avoids decision making which may be as a result of undue influence.

While accepting that reasonable giving and receiving of gifts and hospitality are part of business operations, gifts and hospitality can only be accepted or given in compliance with the Gifts & Hospitality policy and in accordance with customers' policies.

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.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** work to the best of my ability regardless of my political views
- ✓ **I will** report any suspicions or allegations of possible anti-competitive behaviour
- ✓ **I will** work without undue influence through the giving or receiving of gifts and hospitality
- ✗ **I will not** make monetary or other donations to any political parties or candidates on behalf of Amey
- ✗ **I will not** accept, offer or provide gifts, cash/cash equivalent or hospitality that do not follow the Amey policy

For further detail, please refer to the following Amey policies:

- Gifts & Hospitality
- Charity & Sponsorship
- Anti-Corruption

We only engage in fair and lawful competition.

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

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

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** only engage in fair and lawful competition on an open and transparent basis
- ✗ **I will not** enter into any agreement with our competitors or exchange non-public sensitive information which could be perceived as hindering fair competition

For further detail, please refer to the following Amey policies:

- Compliance with UK & European Competition Law
- Business Ethics
- Revenue Recognition
- Risk Management

We protect our natural world, minimising our impact on the environment.

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

We believe in sustainable growth and actively pursue continual improvement 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.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** understand the risks my work has on the natural environment
- ✓ **I will** protect and where possible enhance the natural environment

For further detail, please refer to the following Amey policies:

- Environment
- Energy

We only work with suppliers that apply the same standards of ethical behaviour as ourselves.

We conduct business with our suppliers openly and fairly, expecting them to have the same ethical approach to doing business as we have.

We do this by seeking to build long term, sustainable relationships built on mutual trust and communicating with them (both ways) clearly and concisely.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** deal with suppliers on an arm's length, open and transparent basis and in a professional manner
- ✗ **I will not** use suppliers that do not apply the same standards of ethical behaviour as we expect of our own employees

For further detail, please refer to the following Amey policies:

- Sustainable Procurement & Supply Chain

We do not misuse
property or information

We do not misuse property or information

We protect information and everyone's privacy.

Amey understands the value of the information it holds on behalf of our customers, contracts and employees.

This information must only be used for the purpose which it is held or given and it must be stored correctly and securely for the duration that it is required.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** protect confidential and personal information and keep it secure
- ✓ **I will** promptly report any loss of personal information e.g. a laptop or memory stick containing a database of employee details
- ✗ **I will not** take unnecessary risks or use information for purposes other than as intended

For further detail, please refer to the following Amey policies:

- Information Security
- Data Protection & Document Retention
- Data Classification & Handling

We only use Amey assets, intellectual property and systems for work purposes.

Amey assets are critical to day-to-day operations and should only be used for Amey's operational requirements. These assets should be protected, accounted for and not used for personal use or gain.

These include physical assets such as equipment, materials, supplies, laptops, phones, software and systems, and intangible assets such as time and intellectual property.

Amey does in certain limited situations 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.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** use Amey assets, intellectual property and systems for business use only and not for my own personal benefit
- ✓ **I will** keep Amey assets in a secure location, not leaving in cars or baggage areas of public transport and immediately report their loss or theft.
- ✓ **I will** avoid installing any personal or non-approved software on Amey devices
- ✗ **I will not** take unnecessary risks with Amey assets and will keep them safe and secure
- ✗ **I will not** use Amey computer systems to access, obtain, create or distribute any material that's illegal or offensive or that's been obtained illegally. This includes obscene, pornographic, sexist, racist, defamatory and abusive material or material that is in breach of copyright

For further detail, please refer to the following Amey policies:

- IT Hardware
- Intellectual Property
- Acceptable Use
- Anti-Fraud

We communicate honestly and report accurately.

We carry out our operations on an open and transparent basis. It is important that Amey correctly, fully and accurately maintains records of all its activities.

This includes financial records and record keeping completed by employees – including quality reports, inspection sheets, time records, expense reports, claim forms and resumes.

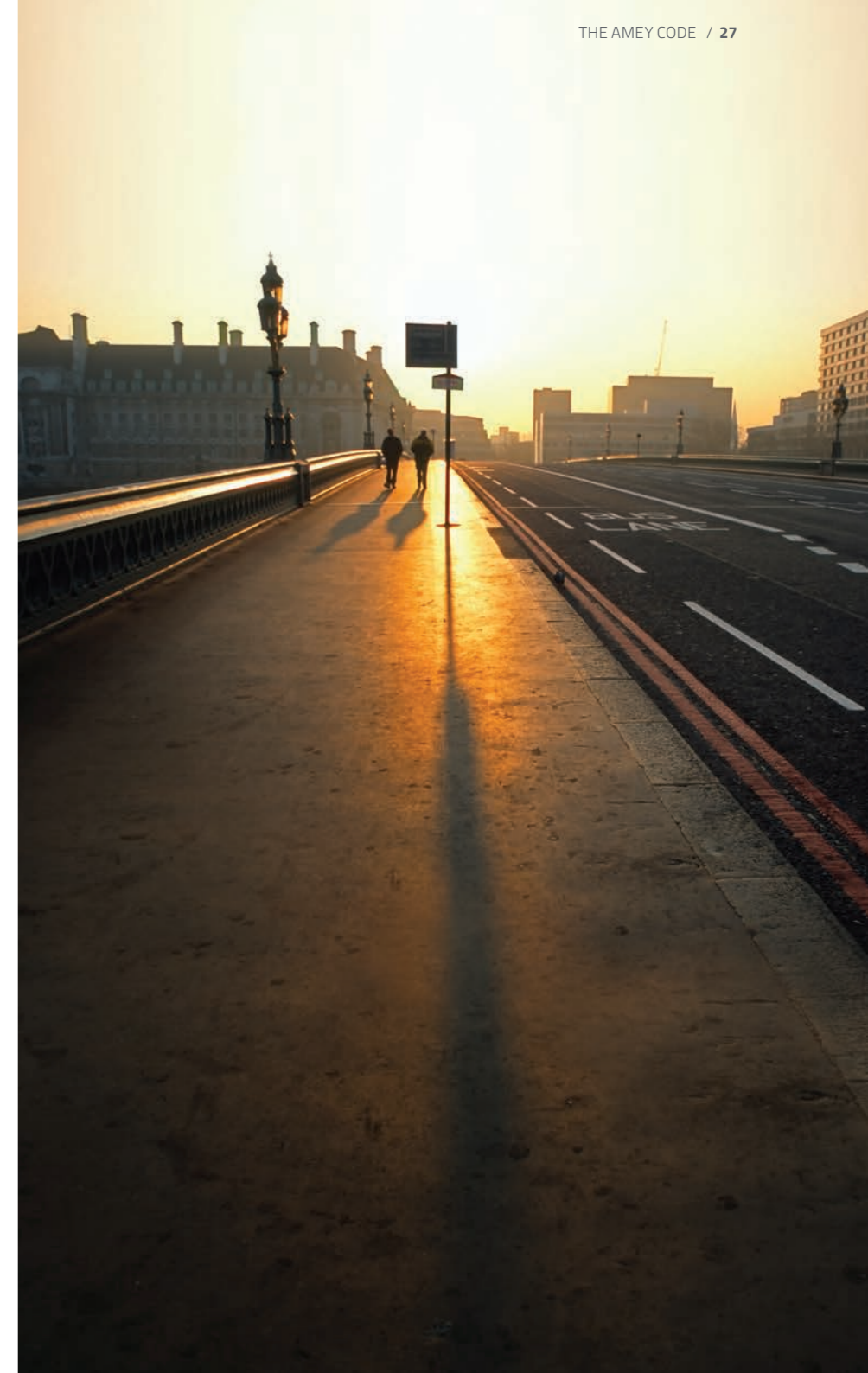
We fully disclose all our tax liabilities, and do not engage in tax evasion.

Everyone who works for and with Amey is expected to adhere to these ways of working:

- ✓ **I will** ensure accuracy in financial and performance reporting and communicate information honestly
- ✓ **I will** comply with internal financial controls and only process transactions in accordance with our delegated authority or once specific approval has been received
- ✓ **I will** ensure all company communications and disclosures have received appropriate internal approval, no matter what the medium
- ✗ **I will not** guess or make assumptions, create false or inaccurate records or sign off on any work without having checked the correctness and completeness of the content and documents

For further detail, please refer to the following Amey policies:

- Corporate Communications
- Social Media
- Anti-Fraud



How to raise a concern

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 the person involved, or with their manager 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 the Amey Code, please challenge it if you feel able to. You will always have the full support of Amey’s leadership team in challenging inappropriate behaviour.
- **Speak to your (or another appropriate) people 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.

DIRECTORS’ HOTLINE

If you’ve tried to resolve an issue, but feel you’re not getting anywhere, you can use the Directors’ Hotline.

Between 9.30am and 11.30am every Wednesday, you’ll be able to speak directly to a member of the senior leadership team to try and resolve your issue.

- Consulting: 0207 492 7824
- Group: 0207 492 7820
- Secure Infrastructure: 01865 713 535
- Transport Infrastructure: 0207 492 7821
- Utilities: 0207 492 7822
- Waste Treatment: 0207 492 7823

WHISTLEBLOWING HELPLINE

Employees are strongly encouraged to report any suspected malpractice or wrongdoing by Amey or its employees that falls short of Amey’s principles and the Amey Code or is not compliant with its other policies and procedures or the law.

Any such concerns should be reported to our Whistleblowing Helpline (0800 160 1797).

What happens when I call?

Employees will be asked to set out in as much detail 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. 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?

Amey undertakes to treat each disclosure with due regard and undertake a level of investigation appropriate to the seriousness of the allegation. Any investigation will be undertaken by an investigator appointed by the Monitoring Officer, who is the General Counsel or his/her nominated representative.

For further detail, please refer to the following Amey policy:

- Whistleblowing



KEY POLICIES TO WHICH THE AMEY CODE RELATES:

- Acceptable use
- Alcohol & Drugs
- Anti-Corruption
- Anti-Fraud
- Business Ethics
- Charity and Sponsorship
- Compliance with UK & Euro Comp Law
- Corporate Communications
- Data Classification & Handling
- Data Protection & Document Retention
- Dignity at Work
- Energy
- Environment
- Expenses
- Flexible Working
- Gifts & Hospitality
- Health & Safety
- Inclusion
- Information Security
- Intellectual Property
- IT Hardware
- Recruitment & Selection
- Revenue Recognition
- Risk Management
- Safeguarding
- Slavery & Human Trafficking Statement
- Social Media
- Social Value
- Sustainable Procurement & Supply Chain
- Travel
- Volunteering
- Wellbeing
- Whistleblowing
- Working Hours

Personal pride in our public service

Amey is one of the top five support services suppliers in the UK. We employ 16,000 people, have a turnover of £2.1bn and a strong forward order-book.

Every household in Britain benefits from the work we do. We maintain the UK's road and rail infrastructure, keep schools safe and clean, manage the UK's defence estate, safely escort prisoners and keep prisons and courts secure. We also collect and process waste, as well as deliver utilities services.

All of this is underpinned by our leading consulting capabilities which uses engineering design and data analytics to better manage the services we all use and rely on.

   [amey.co.uk](https://www.amey.co.uk)

WHISTLEBLOWING HELPLINE

If you feel unable to raise the concern with your manager, Amey offers an independently managed Whistleblowing Helpline: **0800 160 1797**

