

Ethics and Business Integrity Policy

Our Policy: We have a clear and unequivocal approach to business integrity and ethics, which underlie the Carillion values of openness, collaboration, mutual dependency, professional delivery, focus on sustainable, profitable growth, and innovation. This Ethics and Business Integrity Policy demonstrates how we will conduct our business to the highest ethical standards

This policy applies to all employees of any Carillion group company. How we deliver this policy will be reflected in the way we compete for business, through the quality and value of our work, and through the reliability and reputation of our people.

Business Integrity: we do not give or accept bribes. We do not sanction or accept any illegal payments, allowances or gifts-in-kind. We will investigate fully all alleged breaches. We will dismiss any employee who has breached this policy.

Mutual Respect: we do what we say we will do. We treat our people fairly and with respect at all times, avoiding discrimination and bullying. We provide a safe and healthy working environment, and respect sustainable principles in all our dealings.

Trust: we engender trust within our work groups and companies, respecting diverse traditions and cultures. We respect the trust placed in us by others, not least when we are asked to take responsibility for aspects of their business or resources. We maintain and demand high professional standards and demand honesty and openness. We avoid conflicts of interest wherever possible, and we proactively declare any unavoidable conflicts for open scrutiny and resolution.

Legality: we respect the rule of law in all our dealings. We clearly communicate procedures for disciplining those who do not comply with the law or our standards and policies. We maintain a system for confidential reporting of breaches of our standards and policies.

Human Rights: we support the belief that human rights are universal, and adhere to the principles of human rights in our operations. We support the United Nations Universal Declaration on Human Rights.

Our Procedures: Our policy is carried through in detail into our business through a series of detailed procedures. They allow us to carry into practice our reputation for conducting business to the highest ethical standard – which is essential to our relationships with customers, business partners, employees, shareholders and the public. They reflect the way we compete for business, through the quality and value of our work, and through the reliability and reputation of our people.

Implementation and Review: Responsibility for implementation of our Policy and Procedures lies with everyone within Carillion. The policy will be delivered through our business processes and procedures. The Company Secretary will provide any guidance requested and will resolve any issues arising from the Policy. The Policy, and its implementation, will be reviewed annually by the Board.

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John McDonough

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Chris Girling

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Roger Robinson