

## Introduction

FM Conway is a leading infrastructure services company delivering vital services in transportation, the built environment and open spaces for communities and business. We undertake our services through our self-delivery model, and combining our in-house Consultancy Services team with front line operational excellence, we inspect, design, build, produce, enhance and maintain essential infrastructure services for the community.

We are committed to achieving the highest level of ethical standards and strive to ensure integrity and objectivity in our business activity. We embrace the principles of fairness, inclusion and respect in all that we do – and this is underpinned by our core values of care, integrity, innovation and excellence. We expect these principles and values to determine the behaviour of every person involved in our business.

We encourage our managers to lead by example and ensure that all employees are aware of these principles and values. Additionally, we encourage the members of our supply chain to abide by these or similar standards. To this end we have established some overarching commitments for our business operations and outlined how we will do business.

It is the company's responsibility to provide both employees and members of our supply chain and our customers with a safe and confidential mechanism to raise concerns and report breaches of our standards, processes or protocols. It is the responsibility of our employees or members of our supply chain to report anything which may be of concern (be it suspected or validated). It is through open communication and engagement with our stakeholders that we can uphold the standards that we have set for ourselves and expect of each other. Listening to people and responding honestly is how we can do business with integrity.



Michael Conway MBE  
**Chief Executive Officer**

## **Business ethics – our commitments**

### **COMMITMENT ONE: TO OUR CUSTOMERS**

We will provide the highest quality products and services – demonstrating value in innovation, quality, safety and sustainability.

### **COMMITMENT TWO: TO OUR PEOPLE**

We will respect our people, ensuring they are included and treated fairly. We will ensure that the human rights of anyone who works with us either as an employee or other kind of worker are preserved and that they enjoy a safe working environment where their skills are deployed and they have an opportunity to grow and learn. We welcome their report of any concerns and provide channels to do so.

### **COMMITMENT THREE: TO OUR BUSINESS PARTNERS**

We will do business with organisations (be they contractors, suppliers or partners in a joint venture) that share the same principles of fairness, inclusion and respect and seek to operate with the same standards of integrity as ourselves. It is these principles that will underpin our continuing relationship. We welcome their report of any concerns and provide channels to do so.

### **COMMITMENT FOUR: TO OUR COMMUNITIES AND STAKEHOLDERS**

We will conduct our business activities as responsible corporate citizens; we will comply with all legal requirements. We welcome and provide channels to report any concerns that may arise. We strive to have a positive impact – seeking to provide benefit through both financial contribution to and engagement with - the communities of which we are a part.

### **COMMITMENT FIVE: TO SAFETY, HEALTH, THE ENVIRONMENT AND QUALITY**

We will strive to achieve continuous improvement in standards of health and safety, the quality of our operations and the impact on the environment of our activities. We will continue to work towards targets for improvement and measure our progress towards these targets, reviewing our operations continually to achieve them.

### **BUSINESS ETHICS – HOW WE DO BUSINESS**

We are committed to the long-term success of our business and our profitability is key to the development of this goal. We seek to compete fairly and ethically and we will not prevent our competitors in any of the markets in which we are involved from doing the same.

We put absolute value on integrity and fairness and expect the same of everyone with whom we do business. The direct or indirect offer, payment, soliciting or acceptance of bribes in any form is unacceptable. Facilitation payments are also bribes and are not acceptable.

Employees must avoid conflicts of interest between their private activities and their part in the conduct of company business. Employees must also declare their involvement in any other business to the company and any potential conflicts of interest will be adjudged and a course of action to eradicate these agreed.

All business transactions on behalf of FM Conway Ltd (or any other part of the Conway group of companies) must be documented in the accounts of the company in accordance with established procedures and will be subject to audit and disclosure.