

Code of Conduct

Doing the **right** thing



Code of Conduct

Doing the **right** thing

Contents

3. Message from the Chief Executive

4. Introduction

- 5. What is the Code?
- 5. Who does the Code apply to?

6. Our vision and values

8. Our responsibilities to ourselves and our colleagues

- 9. Creating a drug- and alcohol-free environment
- 10. Prioritising health and safety
- 12. Treating people with respect
- 14. Treating people fairly
- 16. Avoiding conflicts of interest

18. Our responsibilities to our customers

- 19. Delivering fair and open competition
- 20. Quality and customer service
- 22. Anti-bribery and corruption
- 24. Exchanging gifts and entertainment
- 26. Fraud, deception and dishonesty

28. Our responsibilities to the community

- 29. Supporting charities
- 30. Being a good neighbour

32. Our responsibilities to the environment

- 33. Protecting the environment

46. Index



Message from the Chief Executive



Our values of excellence, passion, integrity and collaboration are the foundation our business is built upon. By demonstrating these values in everything we do and following some key principles,

we have earned a reputation as a leader in our industry over many years.

To sustain our reputation, we, both as a Group and as individuals, have a duty to behave responsibly, both morally and legally.

'Doing the right thing' has been developed to help us do just that by setting out our principles and policies, and how we apply these to practical, everyday situations. It is more than a list of laws and policies; it defines how we behave in the workplace.

Following our Code of Conduct and doing the right thing demonstrates that we adhere to strong ethical standards which, in turn, helps us to maintain our stakeholders' trust in us as a valued partner. It also serves to protect us, as individuals and as

a business, in an increasingly competitive and regulated environment.

Every one of us is an ambassador of Galliford Try and our brands. How we conduct ourselves reflects on each of us individually and also as a business. It is important, therefore, that each and every one of us takes the time to read the Code of Conduct, understand it, know what is expected of us, and live by and promote its principles.

When we are in a situation that tests our integrity, we must use this Code to help us make the right decision.

It is also our duty to speak up and raise our concerns when we suspect wrongdoing and we know that when we do, it will be dealt with in confidence and with the Group's support.

It is only by being familiar with our Code, using good judgment and speaking up that we can continue to be a truly successful business and achieve our vision to be leaders in the construction of a sustainable future – and this is something we must do together. Thank you for always doing the right thing.

**Peter Truscott,
Chief Executive**

Introduction

"It takes 20 years to build a reputation and five minutes to ruin it. If you think about that, you'll do things differently."

Warren Buffett
Businessman

What is the Code?

This Code of Conduct consists of standards and principles that set out how we work and what we value. It provides a framework for every individual at Galliford Try, and those who work with us, to ensure everything we do is in line with our values, legally compliant and ethically acceptable. As reinforced by our vision and values, we strive to achieve excellence as a business and always act with integrity, and in an honest and fair way.

Who does the Code apply to?

Our employees

The Code of Conduct applies to everyone at Galliford Try. Drawing on our policies, it reminds us of how we work and provides guidance on our approach to key matters as a business.

It is important that we read the Code, understand it and use the principles outlined within it in everyday life and, particularly, if we are faced with ethical dilemmas.

Our leaders

Our leaders set an example to others, demonstrating the highest levels of integrity. If you manage a team, you should ensure your team understands the Code and provide them with the support and advice required to apply the Code and uphold its intent. Individuals should also be given guidance on how they can raise a concern about suspected breaches of the Code, in addition to how such matters are dealt with by the Group.

Our supply chain partners

We have high standards of working practice and expect those working on our behalf to share our values and follow our principles and practices.



How to do the right thing

If you ever find yourself in a situation where you are unsure about how you should behave, ask yourself the following questions:

- Is it legal?
- Does it align with our values?
- What are the consequences of it?
- Am I comfortable with it?

Raising concerns

Failing to comply with this Code or Galliford Try's policies could have severe consequences for the Group and could result in disciplinary action for anyone violating these. You are therefore encouraged to report breaches and suspected breaches of the Code either to management or via the Group's confidential and anonymous whistleblowing procedure (see page 45).

Our vision and values

Our vision is to be leaders
in the construction of a
sustainable future.

How we work

Our vision is to be leaders in the construction of a sustainable future, and our values are excellence, passion, integrity and collaboration. These values encourage us to work ethically and to the best of our abilities, shaping our approach to day-to-day activities and helping us to achieve our business goals, while being a good corporate citizen.

Though we are a diverse Group, we are united by our vision and one set of values.

Excellence

Striving to
deliver the best

Passion

Committed and
enthusiastic in
all we do

Integrity

Demonstrating strong
ethical standards with
openness and honesty

Collaboration

Dedicated to
working together
to achieve results

Our responsibilities to ourselves and our colleagues

"Integrity is doing the
right thing, even when
no one is watching."

CS Lewis
Novelist

Creating a drug- and alcohol-free environment

We are committed to providing a safe, healthy and secure environment for all our employees and those who are affected by our operations by creating a workplace that is free from drug and alcohol misuse.

What it means

Everyone at Galliford Try has the right to work in a safe working environment where they are not subjected to the consequences of drug or alcohol abuse. We carry out our responsibilities free from the influence of drugs and alcohol.

We always

- Report to work in a state fit to carry out our duties.
- Consult a medical professional about any potential risk to our ability to work if taking prescription drugs before starting work.
- Report any potential risks of any medication we are taking to our line manager before commencing work and undertake a risk assessment if required.
- Advise our line manager if we have a drugs or alcohol dependency or if we are receiving treatment for it so that they can provide support including access to our 'be supported' programme.
- Seek to support individuals we manage by providing guidance in line with our policies.
- Confidentially alert our manager if we suspect someone of being under the influence of drugs or alcohol.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Come to or travel to or from work under the influence of alcohol or other impairing substances.
- Ignore the signs that anyone we know at work is under the influence of drugs or alcohol.

Be supported: Employee Assistance Programme

The Employee Assistance Programme 'be supported' provides you and your immediate family with the information, resources and options to address a wide range of issues both at home and at work. You can discuss any issue by calling the hotline in complete confidence 24 hours a day, 365 days a year.

You can contact the programme on 0800 0727 072 or visit www.axabesupported.co.uk for information and support on topics including:

- Legal and financial matters.
- Medical concerns.
- Family issues.
- Consumer rights.
- Relationship issues.
- Personal support through counselling.

How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to your line manager or HR manager.

Prioritising health and safety

Nothing we do is so important that we cannot take the time and effort to do it safely. Our fundamental belief is that everyone has the right to return home unharmed at the end of each working day.

What it means

We are committed to effectively managing all aspects of health, safety and welfare and recognise that achieving high standards in health and safety is an integral part of business performance.

We have robust systems and processes to comply with statutory requirements, and the attitudes and behaviour of our people drive improvement in safety, creating a culture of care as defined by our Challenging Beliefs, Affecting Behaviour programme.

We always

- Prioritise our health and safety and that of those around us, working to be industry-leading in health and safety.
- Follow the principles of Challenging Beliefs, Affecting Behaviour.
- Use the correct PPE (Personal Protective Equipment) required for the task we are performing.
- Endeavour to help everyone we work with to work safely and prevent unsafe working practices and conditions, intervening if we see something unsafe or hazardous.
- Alert a supervisor or manager if we see unsafe behaviours.
- Commit to the principle that all accidents are preventable.
- Know what to do if there is an emergency.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

Safety is in all of

We never

- Carry out tasks we are not fit, trained or qualified to perform.
- Accept the belief that our work is inherently dangerous and accidents cannot be avoided.
- Condone or walk by unsafe practices.



i How can I find out more?

- Visit the intranet for guidance on our policies.
- Review the Challenging Beliefs, Affecting Behaviour toolkit.
- Ask to attend a Safety Leadership Workshop.
- Speak to the Health, Safety and Sustainability team.

Our safety vision

To create and maintain an environment where care for our people and those who work with us is our top priority, and the belief that all accidents are preventable prevails.

our hands

Treating people with respect

We treat people how we would like to be treated ourselves; with respect and dignity. We have a zero tolerance approach to bullying and harassment against our employees and those who work with us.

Treat people the way
want to be treated

What it means

We define harassment and bullying as unwanted and/or uninvited behaviour towards an individual which results in physical, emotional or mental distress to the recipient. This includes verbal abuse, inappropriate remarks, leering, physical contact, sexual advances, ridicule or isolation. It can take the form of comments or behaviour and be based around race, colour, religion, nationality, ethnic origin, sex and sexual orientation or age.

We always

- Respect other people's beliefs, cultures and human rights.
- Protect our colleagues against any form of bullying or harassment.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Behave in a way that is, or could be perceived as, unwelcome, malicious, offensive, discriminatory, intimidating or derogatory, or share inappropriate jokes or offensive material.
- Share information about others that they would not want us to, or engage in or spread gossip or rumours.
- Make unwelcome advances on other individuals.
- Victimise individuals or groups.
- Employ people in a forced or compulsory basis or use child labour.
- Encourage or accept any of the above activity.

How can I find out more?

- Visit the intranet for guidance on our policies.



you

Q A group of my colleagues has been victimising one of the people we work with. His manager knows and does not interject. Should I speak up?

A Yes, as this behaviour is inappropriate. If your manager has failed to deal with the problem adequately, you should contact the relevant director or HR manager in the first instance.

Q We have a bit of a joke about one of our colleagues but he seems to laugh along with it. Is this acceptable?

A No. The joke is at your colleague's expense and regardless of whether he appears to be affected, it has the potential to cause offence and should stop.

Q Someone sent me a funny email the other day - it's a bit rude - can I share it with my colleagues?

A No. The content is still offensive and should be immediately deleted. If the sender is internal, you should make them aware that such emails are offensive and constitute inappropriate use of company email.

We respect other people's differences

Treating people fairly

We value equality and diversity, and operate an inclusive environment where every individual has an equal opportunity to achieve their potential. We do not accept any form of discrimination against our colleagues or those we work with.

What it means

We draw on a diverse range of skills and talents to be the successful company we are and firmly believe that every employee has an equal right to opportunities within the Group. We enjoy and value our diversity and promote equality and respect for all. We do not allow an individual's race, colour, religion, nationality, ethnic origin, gender, sexual orientation, age or any other attribute or quality to influence our behaviour.

We always

- Respect people's differences and treat everyone with dignity and respect.
- Create a culture in which everyone feels valued as an individual and is motivated to give their best in their job.
- Ensure the people we recruit have the behaviours and attitudes we expect to deliver services that meet the needs of our business.
- Support every individual to achieve their potential.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Accept or encourage discrimination.
- Show favouritism or anything that could be perceived as it.

Q My director made an inappropriate comment about a female colleague. What should I do?

A Speak to the director and voice your concerns. In most cases, the director will then speak to the colleague to discuss any offence that may have been caused. Failing this, you should speak to your colleague and ensure she is aware of the formal and informal methods through which she can raise concerns. Ideally, all reasonable steps should be taken to resolve the matter without escalation.

Q I feel like I was unfairly treated and passed up for an opportunity at work. What should I do?

A Speak to the manager that made the decision and ask for an explanation for why you were unsuccessful. In most circumstances, this will resolve the issue.

i How can I find out more?

- Undertake our online diversity and discrimination training module.
- Learn more through the learning and development pages of the intranet.
- Visit the intranet for guidance on our policies.

There is always time to do the right thing



Avoiding conflicts of interest

We make decisions that represent the best interests of the company by avoiding situations where our personal circumstances may conflict with those of the Group's. We declare conflicts of interest when they arise.

What it means

A conflict of interest is a situation where an individual or organisation has multiple interests – be they personal, business or financial – which could compromise or impair motivation or judgment to benefit them or another at the cost of the Group. If a conflict of interests arises, we notify our manager as soon as we become aware of it.

We always

- Avoid direct and indirect conflicts between our personal interests and those of the Group, its customers, suppliers and other stakeholders, and avoid situations where our motives could be questioned.
- Disclose potential conflicts of interest immediately.
- Disclose to our line manager if we know someone who holds influence in an organisation we are working with.
- Declare any interests we have in other organisations.
- Gain prior consent from our line manager to take part in any employment or business venture outside of that we have with the Group.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.


We never

- Inappropriately use our position, contacts or knowledge gained in a business context for personal profit or benefit, or to benefit friends, family or associates.
- Encourage the company to engage an individual or supplier who we know personally unless it has been approved.
- Accept gifts or hospitality that either affect objectivity or impair our judgment, or that could be perceived to do so (see page 24).
- Have any direct or indirect personal financial interest in any business with which the Group has dealings unless that interest is fully disclosed and approved in writing by a business unit managing director or divisional managing director. (Holding five per cent or less in the shares of a company held as investment is an exception.)
- Use the resources of the Group for private or non-Group purposes without specific permission.
- Make political contributions, including non-cash contributions such as the use of the Group's facilities, services or employee time.

i How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to your line manager or HR manager.
- Speak to the Company Secretariat team.

Wisdom is knowing the
integrity is taking it



Q We are looking for a new office manager and my cousin has all the right qualities for the role. Can I send his CV to HR and recommend him for the job?

A Yes, as long as you believe your cousin has the skills, qualifications and personal attributes required for the role then you may put his details forward provided that you are not in a position to influence the decision to employ him. You should also ensure you disclose your relationship when recommending him for the role to avoid any misconceptions.

Q We place orders with a subcontractor who I want to employ to carry out work at my own property or put in touch with a friend or relative. Can I do this?

A Yes, provided you do so in line with the guidance on conflicts of interest and additionally pay a fair market rate for the work. Do not accept special rates, discounts or other favours.

Q We are sourcing a new subcontractor for a specific scheme we are building and my husband's friend owns a company that could deliver the works on our behalf. Can I send him the tender documents?

A You cannot use your position in the company to the advantage of someone you know and so you would first need to declare any actual or potential conflict to the relevant business unit or divisional board. If participation for that party to take part in the tender process is then granted and the company is an approved tenderer, you may share the document. You must also bear in mind that you cannot share the tender documents of one company with another.

right path,

Our responsibilities to our customers

"Exceed your customers' expectations. If you do, they'll come back over and over. Give them what they want - and a little more."

Sam Walton
Founder of Walmart

Delivering fair and open competition

We fully support free and open competition and do not condone any activity which might unfairly restrict the level of competition expected by clients, partners and subcontractors.

What it means

We believe in free competition and refuse to enter into any understanding or agreement with a competitor, supplier or client with the purpose or effect of influencing the price or restricting the availability of any service that the Group or the competitor provides for any third party. We do not partake in bid rigging, price fixing, market sharing, cover pricing or solicit information in competitor's bids. We do not condone the activity of blacklisting.

We always gain information in a way that is legal, honest and fair, and never use or share information that has been solicited or obtained by inappropriate means, or could be perceived to have been gained unethically.

Anti-competitive behaviour is unacceptable and likely to be a criminal offence for both the Group, and potentially the individuals involved.

We always

- Bid contracts and tenders independently from and without any agreement or arrangement with our competitors.
- Exercise appropriate care when working with competitors (for example when working as part of joint ventures and framework agreements).
- Agree - when collaborating with third parties - to restrict the use of commercial information to the purposes of that framework or joint venture, unless previously agreed by the Legal Department.
- Inform others that confidential commercial matters that could affect competition cannot be discussed in our presence at trade meetings. If such discussions continue, we leave and request our departure is minuted.
- Treat competitively sensitive information such as current or future pricing agreements and intentions as confidential.
- Ensure we have the appropriate training to carry out day-to-day business activities within the scope of competition law.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Initiate, engage in or condone bid rigging, price fixing, market sharing, blacklisting, cover pricing or solicit information in competitor's bids.
- Enter into agreements, arrangements or understandings with our competitors or other parties that restrict competition.
- Obtain information by illegal means.

How can I find out more?

- Visit the intranet for guidance on our policies.
- Undertake our online Competition Act training module.
- Speak to the Legal Department.



Quality and customer service

We give total commitment to all of our customers and exhibit professionalism and integrity, working to the highest standards possible. We work in partnership to deliver high-quality, sustainable solutions.

What it means

Providing our customers with high-quality solutions and outstanding service is key to the success of our business. We believe in demonstrating transparency, openness, honesty and, above all, demonstrating our values of excellence, passion, integrity and collaboration. It is only by working to these standards, and with these values, that our business can thrive.

We always

- Earn the trust and confidence of our customers.
- Do what we say we will do and endeavour to keep our promises.
- Communicate honestly and transparently, encourage two-way communication and seek feedback to enable continuous improvement.
- Work with professionalism, demonstrate competence and add value where we can.
- Provide the highest standards of customer service by following the customer satisfaction processes of the business unit we work for.
- Seek to develop long-lasting relationships and long-term value.
- Aim to resolve potential issues amicably and as early as possible.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Knowingly neglect or breach contractual agreements.
- Act unprofessionally, dishonestly or unfairly.
- Ignore customer feedback or fail to act on it.

How can I find out more?

- Visit the intranet for guidance on our policies.





Galliford

challenging
affecting
EXCELLENCE

GallifordTry

Anti-bribery and corruption

We never offer or accept bribes or other inducements or rewards in any form, and refuse to participate in corrupt activity. We report offers and requests of bribes and corrupt activity immediately.

What it means

We define bribery as the act of offering, giving, requesting or receiving money, goods or anything of value in exchange for an alteration of behaviour. This includes, gifts, hospitality, and preferential treatment and does not need to benefit an individual personally. Corruption is illegal, dishonest or fraudulent conduct by those in positions of power or authority. It can include bribery, blackmail, money laundering, deception, extortion and collusion.

Bribery and corruption are serious offences and anyone offering, giving, requesting or taking bribes, or exhibiting corrupt behaviour, will be subject to disciplinary action which is likely to result in dismissal and potentially prosecution.

Facilitation payments are payments or other benefits paid to officials to encourage them to do something which they were going to do - such as issue a permit or visa - sooner than they otherwise would have done. These are also considered bribes and are prohibited.

We always

- Use appropriate caution when accepting or offering gifts, entertainment and hospitality and follow the rules with respect to pre-authorisation and declaration.
- Declare hospitality or gifts given or received.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Offer or make payments (or other favours) to someone if we suspect that it could influence them to misuse their position.
- Misuse our positions in connection with payments (or other favours) for ourselves or others.
- Make political donations.
- Make charitable donations on behalf of the company without authorisation.
- Offer or give financial or other advantages to foreign public officials to seek a business gain.
- Allow or give consent to others to do any of the above.

How can I find out more?

- Undertake our online anti-bribery training module.
- Visit the intranet for guidance on our policies.
- Speak to the Legal Department.

Q We need customs clearance for materials in a foreign port and it is apparent that the local official will put our paperwork to the front of the queue for a modest payment. Can we make this payment?

A No. Even though the official would have given the clearance and we are only paying him to prioritise our paperwork, it is still a bribe under the Bribery Act. It would only be permitted if there is imminent danger to a person's safety - seek guidance from the Legal Department.

Q We are negotiating the purchase of a site for a housebuilding development. The vendor's representative (land agent) explains that there are higher bids from other prospective purchasers. However, he states he will recommend our bid and/or give us a chance to submit an increased bid on the condition that his firm is appointed as sales agent for the development. Is this a corruption concern?

A Yes. In this scenario, the land agent has requested an advantage (his appointment as a sales agent in future) in return for favouring our bid for the purchase of the land. He is potentially performing his role improperly and the request for a future appointment as a sales agent can be classified as a financial or other advantage and therefore a bribe.

Ask yourself if you feel comfortable with it

Q When we are involved in a tendering process, are there any corruption risks?

A Yes, warning signs can include:

- Price fixing or anti-competitive practices.
- Bribery to obtain a main contract award.
- Bribery during subcontract procurement.
- Corruptly negotiated contracts.
- Manipulation of design specifications due to corruption.
- Specification of overly sophisticated design.
- Presentation of false resources and time requirements.
- Obtaining a quotation only to give appearance of price comparison.
- Concealment of financial status of a counterparty.
- Submission of false quotations.

Q When we are involved in a project, can corruption occur during the execution phase?

A Yes, warning signs include:

- False invoicing: for example for supply of inferior materials or fewer quantities.
- False work certificates.
- Excessive repair work.
- Overstating man-day requirements.
- False variation claims.
- False extension of time applications or certificates.
- False assurance that payment will be made.
- False rectification costs.
- Refusal to issue final certificate.
- Requirement to accept lower payment than is due.
- Facilitation payments.
- Overstating of profits.
- False job applications.

Q Our joint venture partner wishes to engage a subcontractor to supply and fit solar panels on a project. The proposed subcontractor is not on our approved supplier list and we have not undertaken any due diligence on their suitability for the project. It later emerges that the subcontractor has supplied and fitted solar panels free of charge to some senior employees of our joint venture partner in order to “demonstrate quality of workmanship”. Is this a corruption concern?

A Yes. The fitting of free solar panels is potentially a bribe. Although no employees from Galliford Try have received any benefit, Galliford Try can be held liable for the acts of others performing services for or on our behalf. This would include our joint venture partners and our subcontractors.

Q We are seeking to sign a contract in a foreign country and are told that we must engage a local agent to act on our behalf in negotiations. His fee seems high for the service he will be providing but we ask around and that seems to be the accepted local custom. Should we have any concerns?

A Yes. High fees for the services being provided may indicate that payments or other benefits will be made to gain influence. We can be prosecuted in the UK for bribes that occur on our behalf overseas. Local custom will be no defence unless enshrined in the local written law. We must check the good standing of our proposed agent and put in place a written agency agreement approved by the Legal Department.

Exchanging gifts and entertainment

We take care to ensure the gifts and hospitality we receive are within reasonable limits, we never allow them to influence our decisions and we never offer or accept gifts or hospitality that could be construed as excessive or as a bribe.

What it means

Entertainment and hospitality can include any attendance at social events, functions, sports matches, theatres or other occasions such as business lunches or dinners – whether they include a business purpose or not and whether received or offered.

Gifts include any token of appreciation and gratitude, gift vouchers, physical gifts or other items of value – whether received or offered.

Exchanging gifts and hospitality can build goodwill and, in most cases, reasonable ordinary levels of hospitality intended to foster cordial business relationships are acceptable under the Code and the law. Caution must be exercised, however, and anything seen to be 'lavish' or 'excessive' – or anything that could lead to questioning the motive of the action should not be accepted or offered.



We always

- Take care to ensure gifts and hospitality are reasonable and within Group guidelines.
- Accurately disclose the exchange of gifts and hospitality, following the pre-approvals process.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Accept or offer gifts or hospitality if they could be seen to influence decisions or create preferential treatment or a sense of obligation.
- Accept or offer gifts or hospitality that prejudice, or could be seen to prejudice, our integrity or impartiality as an employee.
- Make political donations.

i How can I find out more?

- Visit the intranet for guidance on our policies.
- Ask the Legal Department.

Q I have a personal friendship with someone employed by a supplier Galliford Try works with. We often meet socially and typically exchange gifts at Christmas and for birthdays. We might pay for each other's meals or tickets for an event. This is out of our own pockets and we do not seek reimbursement of any of these costs from our companies. Does this breach the Code?

A In this scenario, you should be aware of both the potential corruption and conflicts of interest risks in your personal relationship and avoid acting in a way that could be misconstrued. For example, when the supplier is tendering for work with Galliford Try and you are involved in the procurement process, it may be inappropriate to receive personal hospitality from your friend. At all times, care should be taken that there is no risk of an actual or perceived conflict of interests. Guidance on this matter should be sought from the Legal Department.

Q Our business unit hired a marquee at Ascot for one of our key client's employees and families. The event cost £150 per head and was meant as a treat for all of their staff. No one from Galliford Try attended. Is this in breach of the Code?

A Yes. Hospitality to improve business relationships needs to be attended by representatives from Galliford Try. This event could be construed as lavish and falling outside normal business practice to promote cordial relationships between Galliford Try and our clients. It would be a potential corruption concern to offer corporate hospitality to a client's employees where no one from our business was present as well (and in any circumstances to families) – regardless of the amount of expenditure. In those circumstances, guidance should be sought from the Legal Department.

Fraud, deception and dishonesty

We will never initiate, engage in or condone any form of fraudulent, deceptive or dishonest behaviour and are committed to operating in an open, honest and ethical manner.

What it means

Fraud is a type of criminal activity which describes an act of deception or dishonesty intended for gain or to cause a loss to another party. Typically, it can include deception by false representation, false accounting, forgery, failing to disclose information and abuse of a position.

Making false claims also qualifies as fraud. This can include inflating claims as well as claiming for things we are not entitled to claim.

We always

- Work in an open, honest and ethical manner.
- Comply with the contract terms for any project.
- Keep accurate and complete records and accounts in relation to work and expenses.
- Diligently check invoices, contracts or anything else we are responsible for.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

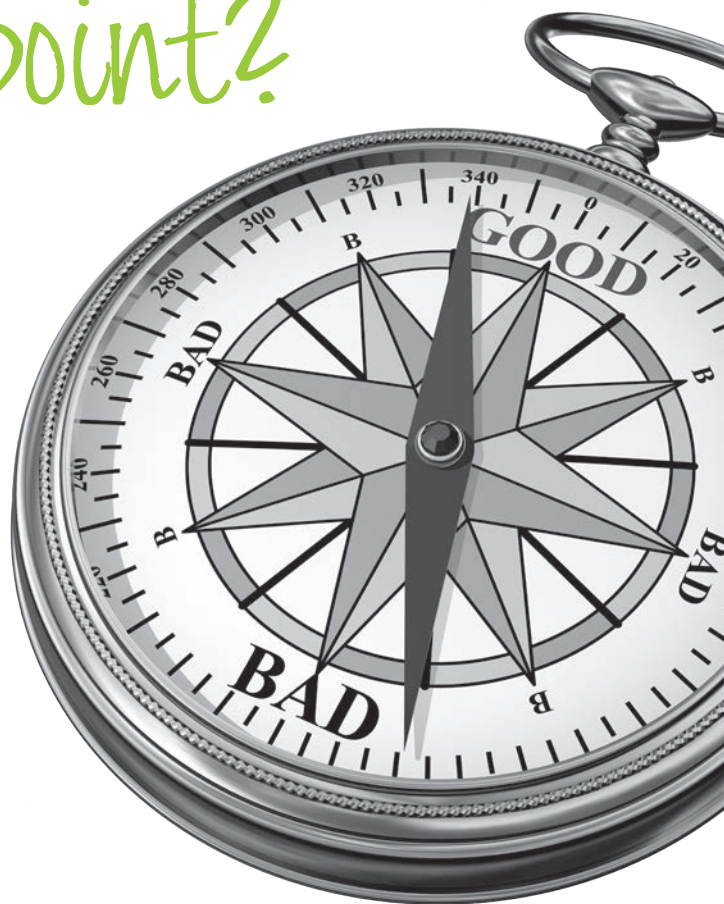
We never

- Alter figures, letterheads, dates or information on documents in a way that could mislead.
- Mislead people we do business with or cause them to be misled by our actions or omissions.
- Proceed with transactions where we have concerns or suspicions about criminal activity.
- Allow company property or assets to be misused or misappropriated.

i How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to the Legal Department.

Where does
your moral
compass
point?



Identifying fraud

Sometimes the way other people behave can cause us to be concerned about fraudulent conduct. Below are some examples of warning signs that may indicate potential fraudulent activity:

- Significant and unexplained changes in behaviour.
- Transactions that take place at an unexpected time, or are unusual in frequency or amount, or involve unexpected recipients.
- Internal controls are not properly enforced or are overridden.
- Discrepancies in accounting records, purchase orders or invoices, or unexplained items appear in reconciliations.
- Missing documents, or only photocopied documents available when an original is required.
- Inconsistent, vague or implausible responses arising from enquiries.
- Discrepancies between paperwork and verbal explanations.
- Missing inventories of physical assets.
- Excessive voids or credits.
- Alterations or other unusual inaccuracies on documents.
- A person appears to exercise excessive control of a process from start to finish with no segregation of duties.
- A person is resistant to others taking over or seeing their work, or avoids taking time off.

Q I am a quantity surveyor on a project. One of the subcontractors has submitted some worksheets for a final invoice which are false and inaccurate. We pass on all of these costs to our client in any event. Should I be concerned?

A Yes. You and the company can commit offences separately if you allow for claims that you know to be false to be processed or passed on to a client. Apart from your concerns about fraudulent conduct, there may also be corruption risks regarding this subcontractor. You should not sign off on false or inaccurate worksheets and you should seek advice from the Legal Department.

Q We are seeking planning permission for a development. We engage a local planning agent to advise us on the best strategy to obtain planning permission from the local planning authority. The agent was recently a member of the authority's planning committee and maintains close ties with its current members. He does not have any relevant professional qualifications but his CV describes his planning expertise as "local know-how". He requests a two per cent fee up front with the remaining two per cent payable to an offshore account after the planning decision. Should we have any concerns?

A Yes. There are a number of warning signs in this scenario. You would need to consider whether the level of commission is unusual. In addition, there appear to be a number of other concerns: the agent may have a potential conflict of interest because of his former role; the agent wants an upfront payment which is suspicious; it is not clear what services the agent will be providing; and the agent wants part of a payment to be paid to an offshore bank account when it appears he resides and is performing services in the UK. You would need to consider whether these signs indicate that payments, other benefits or improper activity will be offered by the agent to members of the committee.

Our responsibilities to the community

"How wonderful it is that
nobody need wait a single
moment before starting
to improve the world."

Anne Frank
Diarist

Supporting charities

We are proud to support charities and not-for-profit groups as part of our contribution to the communities in which we work.

What it means

We often support local causes to make a positive impact in the communities we work within and are encouraged to volunteer time to good causes on company time through our volunteering policy.

We always take care of our responsibilities when deciding to support an organisation on the Group's behalf and we record our efforts to allow us to demonstrate our commitment and promote the excellent work that we do.

We always

- Record charitable giving including time, materials and donations accurately in our financial records and accounts, and in Oracle where appropriate.
- Obtain the required information before making, promising or giving any donation on behalf of the business and we retain this information for our records.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Knowingly allow charitable donations to mask corrupt or fraudulent activity.
- Make charitable donations if we believe they could be construed as improperly influencing another party with whom Galliford Try has a business relationship.

Volunteering policy

Volunteering for a good cause is an excellent way to make a positive impact in the communities which we work within. The Group therefore offers all employees up to two paid days of volunteering time each year. Learn how you can apply by reading the guidance on the intranet.

How can I find out more?

- Visit the intranet for guidance on our policies.



Being a good neighbour

We seek to make a positive impact in the communities in which we work and behave in a socially responsible manner, improving the image of our industry. We treat all of our stakeholders with respect, courtesy and consideration and never conduct ourselves in a manner which is detrimental to the Group's interests or reputation – even when we are away from work.

What it means

We represent our business and always live up to our values, behaving with pride and integrity, demonstrating excellence and collaboration. We believe in maximising the positive impact of our operations through active engagement with the local community. On our construction projects we do this by consulting with our stakeholders to understand and address their needs, and have our site performance independently assessed by the Considerate Constructors Scheme (CCS). In our offices, we seek to build lasting relationships with the communities we work with, and give back where we can.

We always

- Take pride in working at Galliford Try and take care to protect its reputation and future.
- Treat the public with courtesy and consideration, embracing CCS values and respecting the culture and customs of the communities we are working within.
- Log any charitable work we do on company time in the appropriate way.
- Strive to resolve disputes amicably.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.



We never

- Treat people in a way we would not want to be treated ourselves.
- Cause unnecessary disruption to local communities.
- Behave in a way that could negatively impact the Group's reputation.
- Disclose confidential information about the Group.



i How can I find out more?

- Read our CCS Best Practice Guidance on the intranet.
- Visit the intranet for guidance on our policies.

Communicating with the media

If you receive a call from the media, or wish to make contact with the media, please liaise with the Group Marketing & Communications team.

Social media

Employees must not reference the company or publish or share internal or company information on social media, or make derogatory/defamatory comments relating to the company's stakeholders. In addition, employees must not use the company network, its IT resources or an IP address that could be linked with the company to take part in social networking or associated activities.

Our responsibilities to the environment

"We ourselves feel that
what we are doing is just
a drop in the ocean.
But the ocean would be
less because of that
missing drop."

Mother Teresa
Missionary

Protecting the environment

We aim to protect the environment and plan for its improvement.

What it means

We acknowledge that environmental protection and climate change are among the greatest challenges we face, both as a society and a business. We recognise that we have a key part to play through minimising the environmental impact and carbon footprint of our operations to ensure the long-term sustainability of the products and services we provide.

We always

- Act responsibly to protect the environment.
- Endeavour to be efficient in the use of energy, fuels, materials and water, and seek ways to reduce the amount of waste we generate.
- Manage hazardous materials effectively to avoid pollution and avoid contaminating watercourses.
- Act to protect local ecology, improve it where possible and seek ways to reduce our impact upon our neighbours.
- Take the initiative to improve our environmental performance.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never


- Waste resources.
- Allow environmental risks or incidents to go unreported.

On site we

- Provide sufficient resources to ensure conformance with our policies and standards.
- Ensure staff and our supply chain understand their environmental responsibilities in relation to the work they undertake.
- Ensure suitable, adequate and effective risk assessments and method statements are implemented to protect the environment.
- Implement, use and maintain environmental control equipment to avoid environmental harm.
- Plan to effectively manage foreseeable environmental incidents.
- Supervise, monitor and review site activities to ensure conformance with our policies and standards.
- Seek guidance if we are unsure.

📍 How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to the Health, Safety and Sustainability team.



Cutting carbon is everyone's business

Our responsibilities to our supply chain

"Courage is what it
takes to stand up and
speak, courage is also
what it takes to sit down
and listen."

Sir Winston Churchill
War-time prime minister

Developing long-term relationships

We are committed to working closely with our supply chain and subcontractors to develop mutually beneficial relationships by promoting our practices and principles, and treating them with fairness, respect, trust and transparency.

What it means

Building a resilient supply chain is key to achieving our objectives as a business. We are committed to working collaboratively with our supply chain and subcontractors through an approach that consistently demonstrates shared values and excellent behaviours and processes to provide mutual benefit and deliver excellence on behalf of our clients.

- Embrace the principles of BS 11000, a British Standard that provides a strategic framework to establish and improve our relationships, where applicable.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We always

- Select suppliers in a fair way, based on skill, competence and value for money.
- Strive to meet contractual obligations.
- Communicate honestly and transparently.
- Develop strong, sustainable relationships based on trust, shared values and behaviours.
- Follow our procedures on bribery and corruption.
- Avoid conflicts of interest.
- Seek to ensure the relationships we build are effective, optimised and deliver enhanced benefits to all parties.
- Resolve disputes at the earliest stage.

We never

- Share confidential information.
- Hide conflicts of interest.
- Do anything that could compromise competition.

How can I find out more?

- Read the Advantage through Alignment booklet.
- Visit the BS 11000 pages of the intranet.
- Visit the intranet for guidance on our policies.



Our responsibilities to our business

"Strive not to be a
success, but rather
to be of value."

Albert Einstein
Physicist

Company records, accounts and reporting

We are committed to ensuring that accurate business records are maintained and that financial statements and underlying records are complete and reflect the true state of the business. We use our robust system of internal controls, which have been designed to safeguard this.

What it means

We keep accurate and complete commercial and financial records and have appropriate internal controls in place to achieve this. This is critical to our credibility and reputation and fulfils our legal and regulatory obligations.

We always

- Report business transactions accurately and fairly.
- Ensure all expenses claims and declarations relating to hospitality, gifts or expenses incurred to third parties are accurately completed.
- Ensure invoices, accounts and other records relating to dealings with clients, suppliers and other business partners are prepared and maintained accurately and with completeness.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Directly or indirectly falsify documentation or allow it to be falsified.
- Conceal or destroy documentation or records prior to any predetermined period.
- Keep things 'off-book'.
- Misrepresent facts or data.

How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to the Group Finance team.



Speak with honesty, think and act with integrity

Dealing in shares

We do not use insider knowledge to our gain or allow it to influence the actions of others when share dealing.

What it means

In certain circumstances either by virtue of our day-to-day jobs or as a result of a particular project we are working on, we may gain access to price sensitive information that is not publicly available and which, on publication, would be likely to affect the stock market price of our shares. Using this information to our advantage, or to the benefit of others is illegal.

Trading shares or securities, asking others to do so on our behalf, or tipping them off even when we do not stand to gain from the deal ourselves is known as 'insider dealing' and is a criminal offence when we are in possession of price sensitive information. It is also a criminal offence for any person to misuse inside information.

We always

- Inform our line manager if we come across inside information and are not already on one of the company's 'insider' lists.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Disclose confidential information about the company unless we have authorisation to do so.
- Deal in shares or securities, or allow our connected persons to do so while in possession of insider knowledge or when explicitly prohibited to do so.
- Spread false information or participate in any activities that could influence the price of shares in a publicly listed company.

i How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to the Company Secretariat team.



with sincerity

Preventing money laundering

We maintain, implement and monitor appropriate and adequate procedures to comply with legal and regulatory responsibilities to anticipate and prevent any Group company being used for money laundering and illegitimate activity.

What it means

Money laundering describes the act of concealing money or assets acquired or exchanged through criminal activity under business activity to give the appearance that they have been legitimately acquired. Money laundering also includes money that is used to fund terrorism, however it is obtained.

We never condone, facilitate or engage in money laundering and ensure we have the relevant controls in place to protect ourselves against money laundering.

We always

- Identify and assess risks of the company being used for money laundering and terrorist financing purposes.
- Use our judgment and the relevant processes and internal controls for the purposes of compliance.
- Monitor adherence to our processes and internal controls.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Accept cash payments without prior clearance from the Legal Department.
- Knowingly do business with anyone we believe to be involved in money laundering.
- Conceal or misrepresent money that may be the proceeds of criminal activity.
- Discuss suspicious behaviour with external parties or the individual or group involved unless authorised to do so by the Legal Department.

How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to the Legal Department.

Company property and resources

We take care of company property and resources and use them responsibly, safely, securely and as outlined within our policies.

What it means

We understand that we need to act responsibly when using company assets and we act in a manner that protects the property, using assets responsibly and safeguarding them in a manner that befits the property in question. We always take care of company property and resources.

We always

- Protect Group property and resources from damage, theft, loss, misuse, fraud and destruction.
- Make proper and efficient use of company property and resources.
- Avoid waste and only buy what we need if buying materials on behalf of the company.
- Treat company assets and resources with care and confidentiality.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Abuse our privileges or any assets or resources in our possession.
- Use the company's assets for personal use unless agreed with a line manager or stated in a Group policy.

Examples of company assets

- Our time at work.
- Site materials.
- Company money.
- Company cars.
- PCs, laptops and other equipment.
- Emails, data and software.
- Telephones and mobile phones.
- Printers and photocopiers.
- Company trademarks.

How can I find out more?

- Visit the intranet for guidance on our policies.

Take care of our
company's assets

Intellectual property and information

We respect the intellectual property and information belonging to the Group and other organisations and use it in line with laws, policies and procedures.

What it means

Intellectual property is something unique that we create – not just an idea. Examples include the names of our products and brands, our inventions, the design and look of our products, the things we write, make or produce.

Information is the lifeblood of the company and should always be used correctly and appropriately so we can do our work efficiently.

We always

- Keep confidential information secure.
- Seek advice from the Legal Department when naming new products or services.
- Seek advice from the Legal Department when dealing with patents or other intellectual property rights.
- Take care to avoid the indirect disclosure of such information through overheard conversations or documents that could be viewed.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Use confidential information from previous employment.
- Use any confidential information for our own purposes.
- Use unlicensed photos, videos or software.
- Copy documents, reports, videos, software etc if we do not hold the copyright to them or unless we have written authorisation to do so.
- Disclose confidential information unless we have written authorisation or share information that could be harmful to the Group and organisations it works with.
- Discuss or share confidential documents or leave them where unauthorised persons may read them.
- Disclose confidential information to any person, firm or other body relating to the affairs of the Group, its suppliers, customers or trade secrets either during employment by the Group or after termination of employment.

How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to the Legal Department.



Protecting personal data

We take care when recording data about others in all forms; we respect other people's privacy and treat their personal information with confidence. We comply with all relevant data protection and privacy laws and ensure that we use information in line with the procedures in place to enable compliance.

What it means

In the course of our jobs we may come across personal or confidential information which we must only use in the way that has been authorised and in compliance with the Data Protection Act which safeguards and regulates the use of personal data on both computerised and manual files. This includes only keeping and using such information when we need to, to do our work. It includes names, addresses, phone numbers, dates of birth, national insurance numbers, job titles and photographs or anything that can be linked back to an individual person. We treat this data confidentially and we remember that it could be acquired by the concerned individuals or groups under the Data Protection Act - even if the information is intended to be private and confidential.

We always

- Process this data fairly and lawfully and in accordance with the rights of data subjects under the Act.
- Source this data solely for specified and lawful purposes, and do so in a manner that is adequate, relevant and not excessive in relation to the purpose for which it is acquired.
- Keep data accurate and up-to-date.
- Protect data against unauthorised or unlawful processing and against accidental loss, disruption or damage.
- Keep data secure.
- Ensure it is only ever shared on a need-to-know basis or with the consent of the individual involved.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Keep data for longer than is necessary.
- Check references without seeking permission beforehand.
- Condone blacklisting.
- Transfer data to other countries without adequate protection.

Requests for information under the Data Protection Act

The Group is required to disclose information held on individuals, if requested under the Subject Access Requests section of the Data Protection Act 1998 - even if the information is intended to be private and confidential. To protect yourself and the company from complaints and legal action, take care when recording any information about other individuals or groups including existing or potential employees, joint venture or other partners, suppliers, subcontractors and customers. This extends to past, present, future and potential individuals and includes writing:

- Emails.
- Letters.
- Reports.
- Meeting minutes.
- Databases.
- File notes.
- Diary entries.

How can I find out more?

- Undertake our Data Protection Act training module.
- Visit the intranet for guidance on our policies.
- Speak to the Legal Department.

Use of IT

We use our computers, laptops, email, internet and intranet for business and professional use and ensure the security, integrity, confidentiality and availability of all electronic communications and information-based resources.

What it means

Electronic communications systems such as the internet and access to email are provided to us for work purposes. The Group has a legitimate interest in safeguarding its assets and our reputation against improper conduct.

We never use the Group's systems to access, display, store, generate or send to others material which are illegal or may be regarded as causing offence. We cannot expect privacy in respect of emails sent or received on the Group's systems, or when using the Group's internet connection.

As corporate information is critical to the organisation's success, it is company property. We should be aware that all company information that is used on company IT devices (or personal devices where they have been allowed) is owned by the Group.

We always

- Use email responsibly and cautiously.
- Use the appropriate email signature including our name, job title, business unit name, address and relevant contact numbers.
- Forward our emails to another user when away or set up an out of office response.
- Retrieve mail regularly and reply promptly.
- Lock our workstations when away from our desks.

- Report loss, theft and damage of IT equipment.
- Lead by example, embracing our vision and values.
- Comply with all relevant laws, policies and procedures.
- Ask for guidance if we are unclear about how to do the right thing.
- Speak up if we see or suspect wrongdoing.

We never

- Abuse or misuse the systems and equipment provided to us.
- Download software, screensavers or other applications.
- Send or forward junk emails.
- Share passwords with other employees.
- Use the Group's systems to access, display, store, generate or send to others material which is illegal or may be regarded as causing offence.

How can I find out more?

- Visit the intranet for guidance on our policies.
- Speak to the IT team.



Raising concerns

*"You must be the change
you wish to see in the
world around you."*

Mahatma Gandhi

Leader of the Indian independence movement

Doing the right thing

As well as having a duty to do the right thing, it is also important for us to speak up when we see or suspect wrongdoing or any breaches of the Code or our policies and procedures. Raising a concern, even if we turn out to be mistaken, could not only protect the Group and employees from legal action, but it could save lives.

How to speak up

In most cases, your line manager should be your first port of call. If you prefer not to speak with your line manager, speak with the department specified in the corresponding section of the Code. In the vast majority of situations, these concerns can be resolved informally.

Alternatively, you can raise a concern using our dedicated telephone hotline. The service, known as 'Safecall', is an independent and confidential reporting line that is available all year round.

Is there anything I shouldn't report to a line manager?

Concerns relating to bribery, corruption, fraud, money-laundering or anti-competitive activity should be reported directly to the General Counsel, Head of Legal Services or Safecall. They should not be dealt with at project or business unit level. This is because steps can be taken

What can I report to Safecall?

You can use Safecall to report both incidents that have taken place or may take place. This could include:

- Alleged acts of harassment, discrimination, victimisation, bullying or any other acts/omissions where the grievance procedure is felt to be inappropriate.
- Any compromises of health and safety.
- Bribery, corruption or fraud.
- Miscarriages of justice.
- Failure to comply with legal obligations.
- Concealment or misrepresentation of Company information.
- Criminal offences.
- Breaches of Company policies and procedures or of this Code.



How to contact Safecall

- Call 0800 915 1571.
- Visit www.safecall.co.uk/report.

Index

Blacklisting	19	Entertainment	24
Bribery	22	Environment	33
Bullying	12	Equality	14
Charitable donations	29	Facilitation agreements	22
Competition	19	Fraud	26
Company records	37	Gifts	24
Conflicts of interest	16	Harassment	12
Corruption	22	Health and Safety	10
Customer service	20	Hospitality	24
Data protection	42	Human rights	12
Deception	26	IT	43
Dishonesty	26	Inclusion	14
Diversity	14	Money laundering	39
Drugs and alcohol	09	Share dealing	38
Email use	43	Whistleblowing	45

Code of Conduct

Doing the **right** thing



