

# Integrity Policy

December 2014



## Integrity Policy

Issue 5, December 2014

### Introduction

VolkerWessels UK believes that integrity is of paramount importance in the workplace; it is one of the Company's core values. The Company expects all employees, and those who work closely with us, to behave with integrity at all times.

Integrity is defined as:

- The quality of having high moral principles; quality of being united (Collins English Dictionary)
- A concept of consistency of actions, values, methods, measures, principles, expectations and outcomes. In Western ethics, integrity is regarded as the quality of having an intuitive sense of honesty and truthfulness in regard to the motivations for one's actions (Wikipedia)

This Integrity Policy is supported by the board of VolkerWessels UK and each of its subsidiary Companies.

### VolkerWessels UK Statement of Integrity

We are open and totally honest; our business is ethically and morally strong and each of us is accountable.

### Our Policy

This policy sets out how VolkerWessels UK expects its employees and representatives to behave in operations throughout the UK and for all its subsidiary Companies. Integrity will ensure the future success of our business and for this reason violation of this policy will be treated with the utmost seriousness in line with disciplinary procedures.

### Scope

This policy applies to employees employed by a VolkerWessels UK Company and employees of all its subsidiary Companies (staff, agency, contract and temporary). Other individuals performing functions in relation to the Company, such as sub-contractors or suppliers are also expected to adhere to it.

The integrity policy also forms part of all our contracts with sub-contractors, suppliers, their agents and any third party. The policy applies to all those working for or on behalf of VolkerWessels UK. We only do business in accordance with our integrity policy, of which the anti-corruption policy forms part.

### Summary

Each circumstance should be considered in its own context by the employee. If you are in any doubt about a situation you should seek advice from your line manager.

The following provides a summary of the main points every employee should consider.

#### Compliance with the Law

All our business operations should be conducted within the laws, rules and regulations of the countries in which we operate. It is our policy to co-operate fully with relevant public authorities and regulatory bodies.

## Integrity Policy

Issue 5, December 2014

## Summary (Continued)

### Human Rights

It is our policy to respect the human rights of everyone associated with VolkerWessels UK ensuring:

- Employees have the freedom to form associations with groups, to organise and to assemble together with the aim of addressing issues of common concern without fear of discrimination
- Appropriate restrictions on the access and use of personal information
- Respect for privacy

### Employment

It is our goal to offer unambiguous and fair terms of employment and to provide employees with appropriate opportunities to develop their skills and progress in their careers. It is our intention to honour all applicable terms and conditions of employment.

### Discrimination

We consider the diversity of the VolkerWessels UK workforce as strength to the business. All employees regardless of their colour, race, religion, gender, marital status, sexual orientation, disability or age should and will be treated equally, with fairness, honesty, respect and dignity.

### Harassment / bullying

(Including sexual, physical or mental harassment, use of abusive language or offensive gestures)

Harassment or bullying in any shape or form will not be tolerated and all employees are strongly encouraged to report such incidents both as witnesses and as victims.

### Health, Safety and Environmental Protection

All VolkerWessels UK employees, representatives and those working on our behalf have a responsibility to ensure that all operations are undertaken to ensure the prevention of accidents, injuries and ill health to employees and others affected by its work, as well as protecting the environment in which they work. Please refer to the Health and Safety, Environmental and Quality Policies for further information.

### Community Engagement

VolkerWessels UK understands the importance of engaging with local communities about the work we are carrying out. Many projects have dedicated liaison managers who maintain an effective dialogue with both residents and businesses in the locality. Employees should always strive to be 'good neighbours' in their areas of work whether that be on site or at one of our office locations.

### Ethics in the Marketplace

VolkerWessels UK business and the business of all its subsidiaries should be carried out with integrity, respect and honesty at all times. See below for further guidance on ethical behaviour in the marketplace, these are examples and do not predict every situation that may occur.

## Integrity Policy

Issue 5, December 2014

### Summary (Continued)

#### Ethics in the Marketplace (Continued)

Fair and legal competition - collaboration with competitors to unlawfully restrain trade or maintain prices is not acceptable.

Confidential information - from time to time, customers, suppliers, advisors or representatives may divulge confidential information to employees. It is our duty to respect these confidences.

Complaints - all those we do business with have a right to make a complaint about our work, all complaints will be investigated and dealt with accordingly.

Business partners / suppliers - we will treat our business partners and suppliers with respect; treating them like we would want to be treated ourselves.

#### Political Contributions

Contributions to political parties by the Company, whether in cash, goods, services or equipment, are not permitted.

#### Bribes or other Payments to Influence Business Transactions

The giving or receiving of any such payment is not allowed. No bribes of any sort may be paid to or accepted from customers, our supply chain, politicians, government advisors or representatives, private person or company. It is not permitted to establish accounts or internal budgets for the purpose of facilitating bribes or influencing transactions (slush funds).

#### Corporate Gifts and Entertainment

Special care must be taken in accepting or giving gifts / entertainment and these are not permitted if it would create a real or perceived conflict of interest. The exchange of social courtesies is acceptable when there is a clear business purpose and they remain within good taste. Neither the receipt nor the giving of excessive entertainment, substantial gifts or favours is acceptable.

#### Conflicts of Interest

Whether actual or perceived, conflicts of interest must be avoided. Actions taken by employees should be objective and made in the best interests of the Company. Personal activities and financial affairs of employees should not conflict with the business affairs of VolkerWessels UK; this includes consultancy work and second jobs. Employees should contact their line manager if a conflict of interest arises or might arise, or is suspected of a colleague.

### Responsibilities

All employees have a responsibility to carry out their roles and duties for the business with complete integrity.

The VolkerWessels UK Chief Executive Officer holds ultimate responsibility for implementing this policy.

## **Integrity Policy**

Issue 5, December 2014

### **Training and Communications**

We will communicate this policy and relevant guidance to employees across the group, through our established internal communications channels.

We will also communicate this policy to our supply chain partners, business partners and wider stakeholders. In line with the Bribery Act 2010 mandatory training will also be provided for all employees of VolkerWessels UK on the anti-corruption policy, which forms part of the integrity policy.

Should anyone have any concerns about any wrong doing, in connection with this policy, by a member of staff or a company representative they should refer to the Whistleblowing Policy, a copy of which can be obtained from your HR department.

### **Monitoring and Review**

The VolkerWessels UK Executive Committee will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.