

## Our Policy

We are committed to acting professionally and ethically in all our business dealings and relationships wherever we operate.

This is more than just following rules. As well as complying with all laws and regulations, we must apply our principles and values. We must all ask ourselves, "Is this the right thing to do? Is this what Mabey Hire stands for?"

We will support all our personnel in doing what is right. No one will be penalised for making the ethically correct decision.

This policy has been endorsed by the Mabey Hire Board.

## Who this policy applies to

Mabey Hire's Ethics and Conduct Policy applies to all our personnel, and to anyone acting on our behalf, in all our business locations and projects.

## Commitments

The following commitments form the basis of our Ethics and Conduct Policy:

### **Health and safety**

We will take all appropriate steps to ensure the health and safety of everyone who works for or with us.

### **Quality**

We will supply products and services that meet the customer's requirements.

### **Protecting the environment**

We will take all appropriate steps to undertake our business in an environmentally responsible manner.

### **Laws**

We will comply with all laws in all jurisdictions in which we operate.

**Criminal activity:** We prohibit all forms of criminal activity:

- We will not offer, give or receive bribes or improper payments, either directly or through any third party.
- We will not defraud or deceive anyone or act dishonestly.
- We will not make facilitation payments.
- We will not offer or accept any gifts, hospitality, donations or benefits that may improperly influence a business decision or impair independence or judgement.
- We will not participate in any other criminal activity, such as extortion, collusion, cartels, breach of trust, abuse of power, embezzlement, trading in influence or money laundering, or any similar or equivalent improper act or practice.

### **Conflicts of interest**

We will avoid situations in which our personal interests or actions could conflict with Mabey Hire's best interests.

## **Human rights**

We will respect and protect human rights.

## **Equal opportunity and diversity**

We will treat everyone equally and encourage diversity. We employ and promote solely on merit.

## **Harassment, bullying or discrimination**

We will not tolerate any kind of harassment, bullying or discrimination against anyone who works for us or with us.

## **Developing our personnel**

We will help our personnel develop and achieve their potential.

## **Relationships with third parties**

We only work with organisations that conform to standards consistent with our own.

## **Objectives and Continuous Improvement**

The Management Review will provide the framework to review this policy and our objectives and to continuously improve our Ethics and Conduct activities.

## **Procedures**

We will implement appropriate management procedures to help prevent any breach of this Ethics and Conduct Policy, and to detect, report and deal with any breach that may occur.

We will monitor the effectiveness of this policy and procedures and will implement improvements and set and review objectives that are necessary to enhance their effectiveness.

We have established a Business Ethics Committee and have appointed a Compliance Director who has the necessary authority and independence to oversee the effectiveness of our procedures.

The anti-bribery aspects of our procedures are compliant with ISO 37001.

It is vital that our Ethics and Conduct Policy and supporting procedures are complied with. We will take appropriate action in the event of any non-compliance.

## **Reporting**

If you have any concerns or believe that there has been any breach of, or is a weakness in, this Ethics and Conduct Policy or Mabey Hire's procedures, please report immediately to your appropriate line manager, or to Mabey Hire's Business Ethics Committee [BEC@mabeyhire.co.uk](mailto:BEC@mabeyhire.co.uk)

Alternatively you can report to our independent reporting line 0800 988 6818. You may if you wish report confidentially or anonymously. We will always follow up a report and take appropriate action.



David Adams

Chief Executive Officer

Mabey Hire Limited

**26.10.2022**