



# Code of Conduct

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# 1.0 Introduction

## 1.1 Why we have this code of conduct

Our Code of Conduct sets out the expected standards of behaviour and the way we conduct business.

At the core of this Code of Conduct are our values:

### **Health Safety and Wellbeing First**

- First and foremost, creating a Safe and Healthy Environment for everyone, all of the time.

### **Operate with Transparency**

- We communicate openly, honestly, and respectfully in all our dealings.
- We share and set expectations with our clients, customers, suppliers, and colleagues.

### **Take Ownership**

- We take ownership and hold ourselves accountable at all times.
- We lead by example.
- We seek feedback and learn from our mistakes to improve.

### **Do The Right Thing**

- We act with honesty and integrity and hold ourselves to a high level of ethical standards.
- We operate with respect and consideration and everyone is valued.

### **Deliver Excellence**

- We collaborate with our customers and clients and provide options and advice using our experience and innovation to deliver projects beyond expectations.

Our values and this Code of Conduct guide us in doing the right thing.

The Code is where we find direction on how to conduct ourselves as Sword employees when we interact with each other, our clients and customers, the communities in which we operate, and other stakeholders.

All employees must take personal responsibility for ensuring that our commitment to our values and this code of conduct is delivered.

## 1.2 Who this code applies to

All Sword employees at all levels including temporary workers must adhere to the principles and requirements contained in the code.

Further we are committed to working only with third parties whose standards are consistent with our own. This includes clients, customers, subcontractors, and suppliers.

Subcontractors, suppliers, consultants, intermediaries, and agents must follow the relevant portions of our Code in their dealings with us.

### 1.3 Failing to Comply with our Code

Sword will take seriously any failure to comply with this code.

The consequences of failing to comply can be very serious including fines, penalties, even criminal liability for individuals or the company.

Any failure to comply with this Code or its supporting policies will be considered to be misconduct. Any breach will be fully investigated, and appropriate action taken which may include disciplinary action, up to and including dismissal.

### 1.4 Reporting a concern

Sword is committed to conducting business with a high degree of integrity and transparency and this depends on a culture in which everyone feels comfortable and confident enough to report instances of non-compliance with our Code.

If you believe that you have experienced or witnessed behaviour which does not comply with the Code, you have a responsibility to report it.

In the first instance you should report the matter to your Manager. If it is a more serious matter or you are not comfortable in discussing it with your Manager, please contact the companies HR Manager. Alternatively, if you wish to remain anonymous please contact the HR Manager in writing.

Any reports received will be investigated promptly and we will take appropriate action based on the findings of our investigation. No-one will face recriminations including any disciplinary action if they have legitimate grounds for believing that there has been a breach of this code of conduct even if subsequently the investigation finds that there is no evidence to substantiate the report as long as the report was made in good faith.

If you have provided your details when raising the concern, then a report will be provided to you of the investigation and actions taken.

If you are a manager, you have a responsibility to ensure that reports of suspected or known misconduct are adequately addressed.

## 2.0 Health Safety and Wellbeing First

### 2.1 Our principles

*We care for about our people and the people affected by our activities.*

*First and foremost, creating a Safe and Healthy Environment for everyone, all of the time.*

*We strive to prevent accidents and promote a healthy and safe work environment for our employees, people working with us and anyone else who may be affected by our activities.*

*We expect third parties with whom we work including clients, customers, subcontractors, and suppliers to have high standards of health and safety and consistent with our own.*

*We will work with others to improve health and safety standards and share best practice.*

*We will lead by example.*

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### 2.2 How does this apply to you?

- Ensure that you understand and comply with health and safety rules and procedures
- Do not start work until you have received a briefing
- Do not carry out any work for which you are not trained or for which you do not have the appropriate equipment
- Remain vigilant for risks and hazards
- Report any potential hazards to your supervisor and stop work if you believe that continuing would place you or others at risk
- Suppliers will work together with Sword to ensure a healthy and safe working environment
- Suppliers will ensure that their employees are adequately trained and provided with the proper equipment to carry out their work
- Report all health and safety incidents
- Encourage and support a positive health and safety culture

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*-See our Health and Safety Policy*

## 3.0 Equality, Diversity, and Inclusion

### 3.1 Our principles

*Everyone should be treated with dignity and respect and have equal access to opportunity.*

*We are committed to developing and promoting a culture where all employees and prospective employees receive fair and equal treatment.*

*We strive to provide equality of opportunity by viewing positively an individual's diversity and recognising that everyone is different and can make a unique contribution through individual knowledge, experience, and skills.*

*To embrace, and encourage its staff to embrace, the benefits of working with a diverse workforce.*

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### 3.2 How does this apply to you?

- Each employee carries responsibility for their own behaviour
  - Treat everyone fairly, equally and with dignity and respect irrespective of age, disability, gender reassignment, marital status, pregnancy/maternity, race, religion or belief, sex (gender) or sexual orientation and/or other irrelevant distinctions.
  - Embrace and support diversity in the workplace
  - Provide equal opportunities for all
  - Comply with all relevant laws
  - Suppliers and Subcontractors will have in place an up-to-date Equality Diversity and Inclusion Policy
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-See our Equal Opportunities and Diversity Policy

## 4.0 Bullying and Harassment

### 4.1 Our Principles

*We are committed to developing and promoting a culture where all employees are treated fairly, equally and with dignity and respect.*

*We will not tolerate any forms of harassment, bullying or discrimination.*

*Any complaints of bullying, harassment or discrimination will be investigated, and actions taken to deal with any behaviour whether intentional or unintentional that constitutes bullying harassment or discrimination.*

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### 4.2 How does this apply to you?

- Each employee carries responsibility for their own behaviour
  - Do not discriminate - treat everyone fairly, equally and with dignity and respect irrespective of age, disability, gender reassignment, marital status, pregnancy/maternity, race, religion or belief, sex (gender) or sexual orientation and/or other irrelevant distinctions
  - You will not display any behaviour which may amount to harassment, bullying or discrimination
  - Speak out if you witness anyone being harassed, bullied, or discriminated against
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-See our Equal Opportunities and Diversity Policy and Harassment Policy



## 5.0 Human Rights

### 5.1 Our Principles

*We are committed to acting ethically and with integrity in all our business dealings and relationships.*

*We respect the human rights of everyone associated with the company and support the principles of the United Nations Universal Declaration of Human Rights.*

*We respect employee's rights to choose employment freely and to have the freedom to associate without the fear of reprisal against the exercise of such freedom and expect third parties with whom we work including clients, customers, subcontractors, and suppliers to have uphold standards consistent with our own.*

*We will comply with national legal requirements in respect of wages and working hours*

*We have a zero-tolerance approach to modern slavery.*

*We will implement and enforce effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.*

### 5.2 How does this apply to you?

- All employees should conduct business with honesty and integrity
- If you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow the reporting procedure in our Modern Slavery (Anti-Slavery) Policy
- Tell us if you think there is more we can do to prevent people from being exploited
- Our supply chain will ensure that they have appropriate policies and procedures in place preventing exploitation and human trafficking
- Our supply chain will ensure their staff are safeguarded, treated fairly and with dignity

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-See our Modern Slavery (Anti-Slavery) Policy and Business Ethics Policy

## 6.0 The Environment

### 6.1 Our Principles

*We are committed to protecting the environment and eliminating or reducing the environmental impact of our activities.*

*We actively work to improve the environmental and social performance of our operations, projects, and services.*

*We seek ways to minimise waste, prevent pollution, use where possible environmental and socially responsible materials and resources.*

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### 6.2 How does this apply to you?

- Everyone must comply with environmental regulations, policies, and procedures
  - Apply the principles of waste minimisation - Avoid creating waste, reduce the amount produced, identify ways to reuse, recycle. Only dispose of waste as a last resort.
  - Deal promptly with any environmental incidents if safe to do so and report to Management
  - Source materials responsibly
  - We expect all our suppliers to where relevant adopt similar environmental and sustainable measures within their own organisations.
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-See our Environmental Policy, Sustainability Policy and Sustainable Procurement Policy

## 7.0 Community Engagement

### 7.1 Our Principles

*We aim to be a responsible member of the communities in which we operate, through charitable donations, providing good employment opportunities and effective services and products.*

*We will conduct our business with respect and consideration for the good of local communities, taking steps to minimise any disturbance as a result of our operations.*

*We will encourage and support employees who wish to undertake voluntary work in their community.*

*All charitable donations will be in accordance with all applicable laws and our Anti-Bribery and Business Ethics Policies.*

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### 7.2 How does this apply to you?

- Everyone must comply with applicable laws and the Company Anti-Bribery and Business Ethics Policies
  - Seek approval from Senior Management before undertaking any charitable or community work if this will be required to be undertaken during company time
  - Be respectful when going to and from your workplace and whilst in the workplace of the communities surrounding our sites and projects
  - Plan deliveries to minimise the potential negative effects on the local communities
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~See our Anti-Bribery Policy and Business Ethics Policy

## 8.0 Anti-Bribery

### 8.1 Our Principles

*We are committed to undertaking our business fairly with honesty and transparency. This must be reflected in every aspect of our business affairs.*

*We take a zero-tolerance approach to bribery and corruption.*

*We are committed to implementing and enforcing effective systems to counter bribery.*

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### 8.2 How does this apply to you?

- We require all employees and any third parties acting on our behalf to conduct business, fairly with honesty and transparency
  - Everyone must comply with applicable laws and the Company Anti-Bribery and Business Ethics Policies
  - Record all payments and benefits provided or received
  - Only accept or offer gifts or hospitality when it is lawful to do so and of low value and normal/customary practice to do so, if in doubt see guidance from Senior Management
  - Report any suspicions of bribery or corruption
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-See our Anti-Bribery Policy and Business Ethics Policy

## 9.0 Fair Competition

### 9.1 Our Principles

*We aim to build our reputation through quality, a safe working environment, being dependable and undertaking works at fair and competitive market rates, gaining business through repeat business and referral.*

*We will always compete in a fair and ethical manner.*

*We are committed to fair competition and do not tolerate any violation of anti-trust laws, competition laws or related regulations.*

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### 9.2 How does this apply to you?

- Everyone must comply with competition laws and anti-trust laws
  - Report any potential violations of competition laws and anti-trust laws
  - You must not disclose non-public or other sensitive information with competitors or other third parties
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-See our Business Ethics Policy and Sustainable Procurement Policy

## 10.0 Conflicts of Interest

### 10.1 Our Principles

*We strive to operate in a manner in which conflicts of interests are actively avoided, and we require our supply chain to do the same.*

*We will identify and manage circumstances where conflicts of interest arise or there is the potential for conflicts of interest.*

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### 10.2 How does this apply to you?

- Every employee has a duty to avoid business, financial or other direct or indirect interests or relationships which conflict or appear to conflict with the interests of the Company.
  - You must not take personal payments from suppliers, which may influence or could be seen as influencing business decisions
  - You must not carry out private work for a similar area of business to that of the Company where there may be difficulty in distinguishing between personal or Company benefit
  - You must not carry out other employment or activity that may conflict with your ability to devote sufficient time and attention to their responsibilities to the Company
  - You must report promptly any possible conflicts of interest to Senior Management
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-See our Business Ethics Policy

## 11.0 Privacy and Data Protection

### 11.1 Our Principles

*We are committed to full compliance with the applicable data protection legislation including the General Data Protection Regulations ("GDPR") and all legislation enacted in the UK in respect of the protection of personal data.*

*We respect everyone's privacy and are committed to being transparent about how we collect, store, and use employees and others personal information.*

*We acknowledge that employees and others have rights regarding the handling of their personal information.*

*We will only use personal information in ways individuals would reasonably expect and will inform them of the intended use and the people with whom we may share it.*

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### 11.2 How does this apply to you?

- All personal information will only be processed in accordance with relevant data protection laws and the Company Data Protection Policy
  - All personal information will be treated confidentially and processed and stored in a secure manner, safeguarded from accidental disclosure, loss, or misuse
  - Promptly report any loss of personal information
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~See our Data Protection Policy and Information Security Policy

## 12.0 Confidential Information

### 12.1 Our Principles

*We will take all measures to protect confidential information relating to the Company and our stakeholders from being disclosed to any person who does not need or have a right to that information in the course of their work.*

*We will keep all confidential information safe and secure and only share it on a 'need to know' basis.*

*We will only disclose third party confidential information with the appropriate authorisation to do so.*

*We are committed to ensuring the appropriate security of all information owned by, processed, or used by the Company including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.*

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### 12.2 How does this apply to you?

- Employees must not make use of for personal gain, nor disclose confidential information obtained through their employment to any third party during or after their employment.
- Confidential information is anything which is not known by the general public and includes but is not limited to;
  - Information regarding the Company's business or operations unless it is necessary for business operations.
  - Commercially sensitive information
  - Information regarding other employees
  - Information regarding clients, suppliers, or other third parties
- You must ensure that confidential information is protected and secure at all times
- You will report immediately any unintended disclosure of confidential information

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~See our Business Ethics Policy and Information Security Policy



## 13.0 IT Use

### 13.1 Our Principles

*We will use our IT systems, responsibly, suitably and for their intended purposes.*

*We are committed to ensuring the appropriate security of all information and company computer systems including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.*

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### 13.2 How does this apply to you?

- You must comply with the Company Information Security Policy
  - Company IT is provided for use at work however the company permits reasonable and appropriate personal use of the facilities
  - You will not use Company IT for any improper purpose or in any way that might affect their operation or integrity
  - You must immediately report any loss of equipment, or unauthorised access or use of our IT systems as soon as you become aware
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-See our Business Ethics Policy and Information Security Policy

## 14.0 Financial Management and Records

### 14.1 Our Principles

*We ensure all financial and other reports and records are complete, accurate and maintained.*

*All records and financial reporting will accurately reflect the true state of the business, based on applicable accounting standards.*

*We will ensure that transactions are recorded accurately in a timely manner supported by appropriately detailed evidence.*

*We will not defraud, deceive, or act dishonestly and will report fraudulent activity.*

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### 14.2 How does this apply to you?

- You will use appropriate internal controls to ensure accurate reporting
  - You will check and inspect to ensure that records are accurate and not misleading
  - You will not support activities designed to nor facilitate or assist in the evasion of taxes
  - You will report anything you suspect might involve fraud, theft, dishonesty, or deception
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